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LEMHI

PROPOSED RESOURCE MANAGEMENT PLAN
and
FINAL ENVIRONMENTAL IMPACT STATEMENT

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Salmon District, Idaho
June 1986

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Salmon District
P.O. Box 430
Salmon, Idaho 83467

IN REPLY
REFER TO:

July 10, 1986

Dear Reader:

Enclosed for your review is the Lemhi Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS). This proposed Lemhi RMP is the land use plan that BLM proposes for the resource area for the next 15 to 20 years. BLM considered all of the comments received by letter and the public hearing and made a thorough review of the comments received by letter and the public some additions and corrections, was chosen as the Proposed Plan for the area.

The procedures for raising a protest about the proposed Lemhi RMP are listed on page 20. The deadline for filing a protest is August 25, 1986.

Sincerely,

Jerry W. Goodman

Jerry W. Goodman
District Manager

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LEMHI PROPOSED RESOURCE MANAGEMENT PLAN
AND
ENVIRONMENTAL IMPACT STATEMENT

FINAL

Lemhi County
State of Idaho

Prepared by
Department of the Interior
Bureau of Land Management
Salmon District

Larry P. Woodard

Idaho Associate State Director, Bureau of Land Management

Proposed Lemhi Resource Management Plan
and
Final Environmental Impact Statement

( ) Draft (X) Final

Lead Agency

U.S. Department of the Interior, Bureau of Land Management

Type of Action

(X) Administrative ( ) Legislative

Abstract

This proposed resource management plan and final environmental impact statement describes and analyzes seven alternative plans for managing 459,566 acres of BLM-administered land in the Lemhi Resource Area of the Salmon District. Alternative A would continue present management. Alternative B favors livestock grazing management. Alternative C emphasizes wildlife, fisheries, wilderness, recreation, watershed protection, and cultural resource management. Alternative D promotes mineral development. Alternative E would intensify forest management. Alternative F, the proposed plan, emphasizes multiple use management. Alternative G provides for management if Congress does not designate the Eighteenmile Wilderness Study Area. This document contains only a recommendation for wilderness. A separate final environmental impact statement will be prepared for the Eighteenmile Wilderness Study Area.

This document also serves as the instrument to satisfy the intent of the 1975 U.S. District Court approved agreement (Case 1983-73) between BLM and the Natural Resources Defense Council et al. in which BLM agreed to consider the impacts of various intensities of livestock grazing in its decision-making process.

For further information, contact:

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LEMHI PROPOSED RESOURCE MANAGEMENT PLAN

TABLE OF CONTENTS

* Attached in back of document.

SUMMARY OF PROPOSED PLAN AND ALTERNATIVES

The Lemhi Resource Management Plan (RMP) and Environmental Impact Statement (EIS) was prepared to provide the Bureau of Land Management (BLM), Salmon District Office, with a comprehensive framework for managing 459,566 acres of BLM-administered public land over the next 15 to 20 years. With increasing demands for various resources, prudent stewardship of the public lands can no longer be accomplished without comprehensive land use planning.

The Lemhi Draft RMP/EIS, published September 1985, is divided into three parts.

Part I of that document is the draft plan for the Lemhi Resource Area, Salmon District (see Map 1 for location).

Part II of that document is the environmental impact statement portion that deals with the expected environmental impacts associated with several alternatives. Each alternative represents a possible plan for the Lemhi Resource Area. Alternative F is the Preferred Alternative and was the same as draft plan (Part I).

Part III, Appendixes of that document consist of specific data on which Part I and Part II are based. These appendixes contain resource information on Determination of Mineral Potential of the RMP Area, Range Management, Big Game Forage Demand, Watershed and Riparian Preferred Alternative Analysis, Soils and Vegetation, Recreation and Visual Resource Management, Wilderness, Economic Calculations, and a Resource Monitoring and Evaluation Plan. More detailed information is available for inspection at the Salmon District Office.

This Proposed Plan and Final Environmental Impact Statement uses an abbreviated format. The BLM considered all of the comments received by letter and at the hearing conducted in Salmon (refer to Public Comment and Review). After a thorough review of the Draft and an analysis of all of the comments, BLM has chosen to adopt Alternative F, with some minor additions and corrections, as the Proposed Plan for the area. Alternative F was identified in the Draft RMP/EIS as BLM's Preferred Alternative. Table S-1 shows outputs or actions for all of the alternatives analyzed.

The Proposed Plan reflects BLM's effort to resolve resource conflicts and ensure that the public lands are managed in accordance with principles of multiple use and sustained yield.

This document contains only a draft proposal for wilderness. A separate Environmental Impact Statement will be prepared for the Eighteenmile Wilderness Study Area (WSA). A proposed wilderness decision for the Eighteenmile WSA is not included in this proposed plan. This is because while the BLM's Idaho State Director has the decision authority for resource management plans in general, Congress has specifically reserved the

authority to make final wilderness decisions. The wilderness recommendations listed under the alternatives on the next few pages are for reference only and do not represent decisions.

After reviewing public comment on the wilderness issue, a Final Eighteenmile Wilderness EIS and wilderness study report will be prepared using data from the comments and the Draft Lemhi RMP. These documents will include the final wilderness recommendation from the Secretary of the Interior to the President and Congress.

Until Congress acts on the President's recommendations, BLM will manage the Eighteenmile WSA under the Interim Wilderness Management Policy. This policy provides protective management for WSAs throughout the various review steps.

After Congress acts, a different management policy will apply. If Congress designates a portion of the WSA as wilderness, it will be managed under the BLM's Wilderness Management Policy and specific management provisions will be formulated in a Wilderness Management Plan for the area. The portion, or all, of the WSA not designated will be managed according to management prescriptions listed in Alternatives F and G.

This document also serves as the instrument to satisfy the intent of the 1975 U. S. District Court approved agreement (Case 1983-73) between BLM and the Natural Resources Defense Council et al., in which BLM agreed to consider the impacts of various intensities of livestock grazing in its decision making process.

ISSUES

Nine issues are addressed in this document. These issues were identified based on planning team member's judgement, interagency consultation, public input, and review by BLM managers. The issues presented below are those that received major emphasis in the public responses and ones that need a land use decision in the resource management plan:

1. Land Tenure Adjustment

   How should the disposal or retention of public lands be managed?

2. Energy and Minerals Management

   a. How will energy and mineral resource development be accommodated?

   b. What public land, if any, should be withdrawn from energy and mineral exploration and/or development in order to protect surface and groundwater quality, visual quality, wildlife habitat, and other resource values?

3. Forest Management

   a. What forest lands are available for intensive forest management?

b. What forest lands should be subject to restricted forest management to protect high recreation, watershed, and wildlife values?

4. Livestock Grazing Management

a. How should the range resource be managed to meet existing and future livestock demand?
b. How much and where should forage be designated for livestock and wildlife use?

c. What special management techniques should be initiated on livestock grazing to improve sensitive areas?

5. Wildlife Habitat Management

a. How should fisheries habitat and seasonal range for big game and sage grouse be managed?

b. How should disposal of public lands containing important wildlife habitat be handled?

c. How should management of habitat for threatened and endangered species be managed?

6. Watershed

a. How should BLM deal with riparian area degradation due to livestock grazing?

b. How should BLM address water quality and fisheries habitat degradation due to forestry practices?

c. How should the problem of early spring turnout and overgrazing by livestock on highly erosive, low elevation rangeland be handled?

7. Recreation Management

a. How should BLM address the overcrowding of existing recreational facilities and the deterioration in the quality of recreational experiences in the Lemhi Resource Area?

b. What management practices should occur within areas of national significance?

8. Off-Road Vehicle (ORV) Management

Which areas should be designated as open, limited, and closed?

9. Wilderness Suitability

Should the Eighteenmile Wilderness Study Area (WSA), or any portion of the WSA, be recommended for wilderness designation?

ALTERNATIVES

Seven alternatives were considered in developing the Lemhi RMP. These alternatives comply with the National Environmental Policy Act and address the issues identified in the resource area. Two alternatives considered but not developed for the RMP were no livestock grazing and no timber harvest.

The seven alternatives are discussed briefly below. The overall theme or emphasis of each is presented first, followed by a summary of management actions and environmental consequences. For the Eighteenmile WSA, implementation of any alternative or resource action that could violate the Interim Management Policy would be delayed until Congress makes a final wilderness designation decision.

The Alternative Summary (Table S-1) illustrates the management actions proposed under the various alternatives.

Alternative A

Alternative A represents the existing situation. The present level of management on the public lands would be continued, with measures being taken to prevent or correct deteriorating conditions. Any changes in management would be brought about through monitoring and the environmental analysis process. All actions would be handled on a case-by-case basis.

The Eighteenmile Wilderness Study Area would not be recommended for wilderness designation. The area would be managed for multiple use values.

As defined by BLM policy, Alternative A is the proposed action for livestock grazing.

Management Action Summary

Under Alternative A, BLM would consider 4,818 acres for transfer from federal ownership through public sales or exchanges. An additional 1,270 acres would be considered for transfer under the Desert Land Act. No lands would be acquired under this alternative except through exchange.

A total of 204,511 acres would be open to oil and gas leasing with standard stipulations, 239,315 acres with seasonal occupancy restrictions, and 31,767 acres under no-surface-occupancy restrictions. All land would be available for oil, gas, or geothermal leasing. A total of 31,767 acres would be closed to non-energy mineral leasing. A total of 471,962 acres would be available for location of mining claims, while 2,346 acres would be closed to mineral entry. A total of 447,631 acres would be open to mineral material sales and 27,267 acres would be closed.

Approximately 30,309 acres of public forest land would be open to commercial harvest under existing regulations, restrictions, and stipulations. Of this acreage, 2,283 acres are within the Eighteenmile Wilderness Study

Area. Under this alternative, 26,269 acres of woodland would be available for non-sawtimber products.

The existing livestock use of 52,541 animal unit months (AUMs) would be maintained even though the active preference is 63,898 AUMs. Range improvements would be installed on a case-by-case basis. There would be grazing on 459,481 acres.

Wildlife habitat would be maintained. Existing game populations of about 7,470 deer, 1,974 elk, and 2,799 antelope would continue to utilize 5,399 AUMs of forage. No formal reservation of forage would be made. Project activity would be limited to that needed to maintain existing habitat. No watershed or riparian area improvements would be completed.

The BLM would maintain 97.7 miles of fisheries habitat in their present condition. Surface-disturbing activities that would affect fisheries habitat would not be allowed.

Existing levels of recreation management would continue throughout the resource area. The special recreation management area designations for the Salmon River, Continental Divide National Scenic Trail, and Lewis and Clark National Historic Trail would be retained. A recreation area management plan would be completed for the Salmon River. Off-road vehicle use would continue to be limited during winter months on 16,230 acres of big game winter range and would be restricted to existing roads and trails in the 24,922-acre Eighteenmile Wilderness Study Area.

For purposes of analysis, it is assumed that management of the Eighteenmile Wilderness Study Area would revert to the multiple use status it had prior to the wilderness study process and would be managed as nonwilderness.

Full suppression fire management guidelines would be followed on 459,566 acres, while prescribed burns would be conducted on 3,200 acres. Heavy fuel loading caused by logging debris and dead trees would be reduced on 1,000 acres to decrease the likelihood of having a disastrous fire.

The 40-acre Chief Tendoy Cemetery would be protected by implementing the cultural resource management plan.

Environmental Consequences Summary

Under Alternative A no increase in public lands would be made available for transfer. The acres of land available for minerals and forest management would remain the same. Ecological range condition would not improve, and recent overutilization of riparian areas by livestock would continue. No significant change in wildlife habitat would occur. Fisheries habitat condition would decline. Water quality and riparian habitat condition would decline. Recreation opportunities would remain the same. Wilderness values would be lost, and cultural resources would decline.

Alternative B

Alternative B emphasizes livestock grazing management. It represents an optimistic outlook for livestock grazing, given present and anticipated future budget levels.

Management Action Summary

Under Alternative B, BLM would consider 3,419 acres for transfer from federal ownership through public sales or exchanges. A total of 6,192 acres having soils potential for agricultural development would be retained to help meet the objective of increasing livestock forage. The BLM would attempt to acquire 4,960 acres primarily through exchange.

A total of 193,416 acres would be open for oil, gas, and geothermal leasing with standard stipulations, 214,804 acres with seasonal occupancy restrictions, and 52,577 acres under no-surface-occupancy restrictions, and 14,796 acres would be closed to oil and gas leasing.

A total of 15,596 acres would be closed to geothermal leasing for recreational development and wilderness. About 67,373 acres would be closed to non-energy mineral leasing. A total of 455,569 acres would be open for the location of mining claims, while 18,789 acres would be closed to mineral entry. About 408,240 acres would be open to mineral material sales and 66,658 acres would be closed.

Approximately 27,726 acres of public forest land would be open to commercial harvest. Of this, 2,275 acres would receive restricted management to reduce impacts to crucial elk winter range. Set-asides included in this alternative would reduce the timber production base by 2,583 acres. About 20,755 acres of woodland would be available for non-sawtimber products and 5,514 acres would be closed.

Livestock management would provide 61,190 AUMs of livestock forage. The BLM would strive to maintain or improve existing perennial forage plants, maintain soil stability, stabilize areas currently in downward trend, and increase availability of perennial forage plants. Range improvements would be implemented to help achieve these objectives.

Wildlife habitat management would be constrained to make it compatible with range management goals. Game populations of about 4,800 deer, 900 elk, and 2,200 antelope would utilize 3,131 AUMs of forage. Project activity would be very minimal but more than under Alternative A. Two habitat management plans would be developed on 56 acres.

A total of 9.5 miles of riparian area would be fenced and four watershed activity plans would be written. New timber harvest roads would be closed when timber sales were completed, except for use in forest and fire management.

The BLM would maintain fisheries habitat in its present condition and trend. Surface-disturbing activities that would affect fisheries habitat would not be allowed.

Recreation management would be enhanced by defining special recreation management area (SRMA) boundaries, emphasizing visual resource management in the SRMAs, and protecting recreation sites with mineral entry withdrawals. The SRMA designations for the Salmon River, Continental Divide National Scenic Trail, and Lewis and Clark National Historic Trail would be retained. A recreation area management plan would be written for each SRMA.

Off-road vehicle use would continue to be limited during winter months on 16,230 acres of big game winter range. A year-round closure would be placed on 18,822 acres because of recreation opportunity spectrum and wilderness management restrictions.

A total of 14,796 acres would be recommended as suitable for wilderness and 10,126 acres as nonsuitable.

Full suppression fire management guidelines would be followed on 444,770 acres, while 14,796 acres would be managed under suppression restrictions to maintain wilderness quality. Prescribed burns would be conducted on 35,115 acres. Heavy fuel loading caused by logging debris and dead trees would be reduced on 10,000 acres to decrease the likelihood of having a disastrous fire.

Cultural resource management plans would be completed for the Chief Tendoy Cemetery, Lewis and Clark Trail, Salmon River Corridor, Indian Area A, and Indian Area B.

Environmental Consequences Summary

Alternative B would transfer the least amount of land from federal ownership. There would be a slight increase in the amount of land closed to mineral development. Commercial forest land available for management would decrease to a moderate degree. Ecological range condition would decline significantly; there would be extensive range improvements; and livestock AUMs would show a major increase. Wildlife, riparian, and fisheries habitat would be significantly degraded. Substantial adverse changes in watershed condition are expected. Recreational opportunities would be increased and wilderness values would be maintained on 14,796 acres. Impacts to cultural resources would increase because of surface disturbance associated with livestock grazing and range improvement projects.

Alternative C

Alternative C emphasizes wildlife and fisheries enhancement, wilderness and recreational values, cultural resource management, and watershed protection.

Management Action Summary

Under Alternative C, BLM would consider 4,077 acres for transfer from federal ownership through public sales or exchanges. An additional 1,190

acres would be considered for transfer under the Desert Land Act. The BLM would attempt to acquire 5,600 acres primarily through exchange.

A total of 180,396 acres would be open for oil and gas leasing with standard stipulations, 174,319 acres with seasonal occupancy restrictions, and 91,526 acres with no-surface-occupancy restrictions. Approximately 29,352 acres would be closed to oil and gas leasing and 30,152 acres closed to geothermal leasing. About 120,878 acres would be closed to solid mineral leasing. A total of 438,805 acres would be open for the location of mining claims, while 35,688 acres would be closed to mineral entry. About 354,735 acres would be open to mineral materials sales and 120,163 acres would be closed.

Approximately 27,355 acres of public forest land would be open to commercial harvest. Of this, 5,156 acres would receive restricted management to reduce the impacts to crucial elk winter range. Set-asides included in this alternative would reduce the timber production base by 2,954 acres. About 19,460 acres of woodland would be available for non-sawtimber products and 6,809 acres would be closed.

Livestock management would provide 29,921 AUMs of livestock forage. The BLM would maintain existing perennial forage plants, maintain soil stability, and stabilize areas currently in downward trend. Range improvements would be limited to those necessary to correct areas of declining condition or to improve livestock management in the area. Allotment management plans would emphasize management of elk and bighorn sheep habitat, and livestock grazing would be excluded on 22 miles of riparian area.

Wildlife habitat protection and enhancement would be one of the primary management goals for the resource area. Game populations of about 10,470 deer, 2,847 elk, 2,950 antelope, and 400 bighorn sheep would utilize 7,722 AUMs of forage. Extensive project development would provide water, habitat, and safety for wildlife. Six habitat management plans would be developed on 260,056 acres.

A total of 22 miles of riparian area would be fenced and four watershed activity plans would be written. New timber harvest roads would be closed when timber sales were completed, except for use in forest and fire management.

The BLM would maintain 92.7 miles of stream in present fisheries habitat condition. Utilization of forage would be limited to a maximum of 50 percent on Haynes and McDevitt creeks. All livestock grazing would be excluded on five miles of tributary stream.

Recreation would be recognized as the principal use of the lands in the three special recreation management areas (SRMAs). Additional mineral withdrawals, restrictions on some nonrecreational uses, and restrictive visual management practices would be implemented. A recreation area management plan would be written for each SRMA.

Off-road vehicle use would continue to be limited during winter months on 16,230 acres of big game winter range. A year-round closure to all vehicle use would be placed on 24,922 acres because of wilderness designation.

A total of 24,922 acres would be recommended as suitable for wilderness designation.

Full suppression fire management guidelines would be followed on 434,644 acres, while 24,922 acres would be managed under suppression restrictions to maintain wilderness quality. Prescribed burns would be conducted on 11,520 acres. Heavy fuel loading caused by logging debris and dead trees would be reduced on 10,000 acres to decrease the likelihood of having a disastrous fire.

Cultural resource management plans would be completed for the Chief Tendoy Cemetery, Lewis and Clark Trail, Salmon River Corridor, Indian Head Site, Indian Area A, Indian Area B, and Hawley Creek Canyon.

Environmental Consequences Summary

Alternative C would slightly increase the amount of land being transferred from federal ownership, compared to Alternative A. More acreage would be closed to minerals management than under any other alternative. Commercial forest land available for management would decrease significantly because of restricted management. Ecological range condition would improve significantly and livestock AUMs would show a major decrease. Wildlife habitat condition and available wildlife AUMs would increase. Fisheries habitat would show a significant improvement. Major improvements in riparian habitat, watershed condition, and water quality can be expected. A significant increase in recreational opportunities would take place. Wilderness values would be protected on 24,922 acres. Impacts to cultural resources would decrease significantly.

Alternative D

Alternative D emphasizes mineral development on the public lands. The objective is to manage the federal mineral estate to allow optimum exploration and development, while minimizing unnecessary impacts to other resources.

The Eighteenmile Wilderness Study Area would be designated for nonwilderness uses.

Management Action Summary

Under Alternative D, BLM would consider 3,629 acres for transfer from federal ownership through public sales or exchange. An additional 2,550 acres would be considered for transfer under the Desert Land Act. The BLM would attempt to acquire 2,400 acres primarily through exchange.

All lands would be available for fluid mineral (oil, gas, and geothermal) leasing. About 6,405 acres would be closed to solid mineral leasing. A total of 472,794 acres would be open for the location of mining claims, while 1,564 acres would be closed to mineral entry. About 472,923 acres would be open to mineral materials sales and 1,975 acres would be closed.

Approximately 30,294 acres of public forest land would be open to commercial harvest. Of this acreage, 1,646 acres would be subject to restricted management to reduce the impacts to crucial elk winter range. The only set-aside would be 15 acres for the Williams Lake Recreation Site. About 26,269 acres of woodland would be available for non-sawtimber products.

Livestock management would provide 53,803 AUMs of livestock forage. The BLM would maintain or improve existing perennial forage plants, maintain soil stability, and stabilize areas currently in a downward trend. Range improvements would be implemented to help achieve these objectives.

The general wildlife objective would be to attempt to hold habitat losses to a minimum. Game populations of 5,899 deer, 862 elk, and 1,866 antelope would utilize 3,431 AUMs of forage. Project development would occur, providing water, habitat, and safety for wildlife. Two habitat management plans would be developed on 102,000 acres.

A total of 11.5 miles of riparian area would be fenced and four watershed activity plans would be written. New timber harvest roads would be closed after completion of timber sales, except for use in forest and fire management.

The BLM would maintain 94.7 miles of fisheries habitat in their present condition. Surface-disturbing activities that would affect fisheries habitat would not be allowed.

Recreation management would be reduced to a level which would provide for recreational use of the public lands without improving or maximizing opportunities. No withdrawals or vehicle restrictions would be implemented. The special recreation management area (SRMA) designations would be retained, and each SRMA would have a recreation area management plan prepared. The size of the SRMAs would be minimal.

The 24,922 acres in the Eighteenmile Wilderness Study Area would be recommended as nonwilderness designation.

Full suppression fire management guidelines would be followed on 459,566 acres. Prescribed burns would be conducted on 18,450 acres, and heavy fuel loading caused by logging debris and dead trees would be reduced on 10,000 acres to decrease the likelihood of having a disastrous fire.

Cultural resource management plans would be written for the Chief Tendoy Cemetery, Indian Area A, and Indian Area B.

Environmental Consequences Summary

Alternative D would slightly increase the amount of land being transferred from federal ownership, compared to Alternative A. Less land would be closed to minerals management than under any other alternative. Commercial forest land available for management would decrease slightly. Ecological range condition would improve moderately and livestock AUMs would show a minor increase. Wildlife habitat would show a significant adverse impact, and forage available to wildlife would be less. This alternative would have the most severe impact on wildlife of any of the alternatives. Fisheries habitat would decline. A decline in overall soil, water quality, and watershed condition is expected. Quality recreational opportunities would decrease. Wilderness values would not be protected. Impacts to cultural resources would increase significantly.

Alternative E

Alternative E emphasizes intensive management on 30,309 acres of commercial forest land for sustained yield production.

Management Action Summary

Under Alternative E, BLM would consider 5,087 acres for transfer from federal ownership through public sales or exchanges. An additional 5,310 acres would be considered for transfer under the Desert Land Act. The BLM would attempt to acquire 1,640 acres primarily through exchange.

A total of 175,121 acres and 173,626 acres would be open for oil, gas, and geothermal leasing respectively, with standard stipulations. Also, 264,003 acres with seasonal occupancy restrictions, and 36,469 acres with no-surface-occupancy restrictions would be available for oil and gas and geothermal leasing. All lands would be available for oil and gas leasing. Geothermal leasing would not be allowed on 800 acres. Approximately 36,469 acres would be closed to solid mineral leasing. A total of 469,388 acres would be open for location of mining claims, while 4,970 acres would be closed to mineral entry. About 439,052 acres would be open to mineral material sales and 35,846 acres would be closed.

Approximately 30,309 acres of public forest land would be open to commercial harvest. Of this, 2,283 acres would be within the Eighteenmile Wilderness Study Area. About 26,269 acres of woodland would be available for non-sawtimber products.

Livestock management would provide 49,589 AUMs of livestock forage. The BLM would improve existing perennial forage plants, maintain soil stability, and stabilize areas currently in a downward trend. Range improvements would be implemented to help achieve these objectives.

Wildlife habitat management would be constrained to be compatible with forest management. Game populations of about 8,437 deer, 1,181 elk, 2,600

antelope, and 136 bighorn sheep would utilize 4,920 AUMs of forage. Project development would provide water, habitat, and safety for wildlife. Two habitat management plans would be developed on 148,000 acres.

A total of 11.5 miles of riparian area would be fenced and four watershed activity plans would be written. New timber harvest roads would be closed after completion of timber sales, except for use in forest and fire management.

Fisheries actions would be the same as described for Alternative D.

Recreation management would be enhanced by defining special recreation management area (SRMA) boundaries, emphasizing visual resource management in two of the SRMAs, and protecting recreation sites with mineral entry withdrawals. The three SRMAs would remain and a recreation area management plan would be written for each. Off-road vehicle use would continue to be limited during winter months on 16,230 acres of big game winter range.

The 24,992 acres in the Eighteenmile Wilderness Study Area would be recommended as nonsuitable for wilderness designation.

Full suppression fire management guidelines would be followed on 459,566 acres. Prescribed burns would be conducted on 22,075 acres, and heavy fuel loading caused by logging debris and dead trees would be reduced on 10,000 acres to decrease the likelihood of having a disastrous fire.

Cultural resource management plans would be completed for the Chief Tendoy Cemetery, Lewis and Clark Trail, Salmon River Corridor, Indian Area A, Indian Area B, and Indian Head Site.

Environmental Consequences Summary

Under Alternative E more land would be transferred from federal ownership than under any other alternative. There would be a slight increase, compared to Alternative A, in the amount of land closed to mineral activity. Commercial forest lands available for management would be the same as in Alternative A. Ecological range condition would improve moderately and livestock AUMs would show a minor long-term increase. Wildlife habitat would show a moderate improvement in condition, and forage available to wildlife would be increased. Fisheries and riparian habitat would decline. Decline in overall soil, water quality, and watershed condition is expected. Recreational opportunities would increase. Wilderness values would not be protected. Impacts to cultural resources would increase.

Alternative F (Proposed Plan)

Alternative F is BLM's Proposed Plan for the resource area. A complete description of the plan appears in the section entitled Proposed Management Prescription in this document. A variety of resource uses would

occur. The Plan gives no special emphasis to any one resource but instead emphasizes balanced, multiple use management and is based upon a realistic expectation of funding.

Management Action Summary

Under Alternative F the BLM would consider 4,495 acres for transfer from federal ownership through public sales or exchanges. An additional 1,340 acres would be considered for transfer under the Desert Land Act. The BLM would attempt to acquire 5,600 acres primarily through exchange

A total of 161,909 acres would be open for oil and gas leasing with standard stipulations, 221,519 acres with seasonal occupancy restrictions, and 77,369 acres with no-surface-occupancy restrictions. Approximately 14,796 acres would be closed to oil and gas leasing and 15,596 acres closed to geothermal leasing. About 92,165 acres would be closed to solid mineral leasing. A total of 455,434 acres would be open for location of mining claims while 18,921 acres would be closed to mineral entry. Mineral sales would not be allowed on 92,010 acres, but the remaining 382,888 acres would be open to material sales.

Approximately 28,865 acres of public forest land would be open to commercial harvest. Of this, 1,179 acres would receive restricted management to reduce impacts to crucial elk winter range. Set-asides included in this alternative would reduce the timber production base by 1,444 acres. About 23,138 acres of woodland would be available for non-sawtimber products, while 3,131 acres would be closed.

Livestock management would provide 43,602 AUMs of livestock forage. The BLM would maintain or improve existing perennial forage plants, maintain or improve soil stability, and stabilize or improve areas currently in a downward trend. Range improvements would be implemented to help achieve these objectives.

Game populations of 9,350 deer, 2,194 elk, 2,950 antelope, and 200 bighorn sheep would utilize 6,466 AUMs of forage. Project development would occur, providing water, habitat, and safety for wildlife. Six habitat management plans would be developed on 260,056 acres.

A total of 15.5 miles of riparian area would be fenced and four watershed activity plans would be written. New timber harvest roads would be closed when timber sales were completed, except for use in forest and fire management.

The BLM would maintain 94.7 miles of fisheries habitat in present condition and improve 3.0 miles. Surface-disturbing activities adversely affecting Class III streams would be avoided, if practical.

Recreation would be recognized as the principal use of the lands in the three special recreation management areas (SRMAs). Additional mineral withdrawals, restrictions on some nonrecreational uses, and restrictive visual management practices would be implemented. A recreation area management plan would be written for each SRMA.

Off-road vehicle use would continue to be limited during winter months on 16,230 acres of big game range. A year-round closure to all vehicle use would be placed on 14,796 acres because of wilderness designation.

A total of 14,796 acres would be recommended as suitable for wilderness designation.

Full suppression fire management guidelines would be followed on 444,770 acres. Prescribed burns would be conducted on 30,078 acres, and heavy fuel loading caused by logging debris and dead trees would be reduced on 10,000 acres to decrease the likelihood of having a disastrous fire.

Cultural resource management plans would be completed for the Chief Tendoy Cemetery, Lewis and Clark Trail, Salmon River Corridor, Indian Area A, and Indian Area B. A recreation area management plan would be written for the Lewis and Clark Trail that would provide for protection of cultural and historic values.

Environmental Consequences Summary

Under Alternative F there would be a modest increase in the amount of land being transfered from federal ownership, compared to Alternative A. The amount of land closed to mineral activity would be slightly increased. Commercial forest land available for management would decrease slightly. Ecological range condition would improve moderately. Livestock AUMs would show a minor increase. Wildlife habitat condition and available wildlife AUMs would increase but not to the extent they would under Alternative C. Fisheries and riparian habitat would show a slight increase. Slight decline in watershed condition would occur because of timber harvesting. A major increase in recreational opportunities would take place. Wilderness values would be protected on 14,796 acres. Impacts to cultural resources would decrease slightly.

Alternative G

Alternative G is basically the same as the Preferred Alternative (Alternative F). It was developed to manage those resources that would be affected if Congress did not designate as wilderness the Eighteenmile Wilderness Study Area recommended in Alternative F.

Management Action Summary

Alternative G would involve the same management actions as Alternative F, except for the following:

A total of 163,723 acres would be open for oil and gas leasing with standard stipulations, 221,905 acres with seasonal occupancy restrictions, and 89,165 acres with no-surface-occupancy restrictions. There would be no lands closed to oil and gas leasing, but 800 acres would be closed to geothermal leasing. About 89,965 acres would be closed to solid mineral leasing. A total of 470,233 acres would be open for

location of mining claims, while 4,125 acres would be closed to mineral entry. Material sales would be allowed on 385,068 acres, while 89,830 acres would be closed.

Approximately 28,962 acres of public forest land would be open to commercial harvest. Of this, 1,179 acres would receive restricted management to reduce impacts to crucial elk winter range. Set-asides included in this alternative would reduce the timber production base by 1,347 acres. About 23,336 acres of woodland would be available for non-sawtimber products, while 2,933 acres would be closed.

A total of 2,182 acres in the Eighteenmile Wilderness Study Area would be open to off-road vehicle use. The remaining acreage would be closed to retain existing recreation opportunities.

A total of 14,796 acres in the Eighteenmile Wilderness Study Area would receive full suppression fire management. A prescribed burn would be conducted on 500 acres in the study area.

Environmental Consequences Summary

Under Alternative G impacts would be the same as described for Alternative F, with three exceptions. There would be less land closed to mineral activity than in Alternative F. Commercial forest land available for management would increase slightly when compared to Alternative F. Wilderness values would receive less protection.

The Alternative Summary Table (Table S-1) illustrates the management actions proposed under the various alternatives.

TABLE S-1
ALTERNATIVE SUMMARY TABLE

LEMHI RMP

Managemeot Objective/Actioo	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
LANDS							
A. Transfer areas							
1. Transfer (sale, exchaoge)	4,818	3,419	4,077	3,629	5,087	4,495	4,495
2. Agriculture entry							
2a. Soils poteotial	1,270	0	1,190	2,550	5,310	1,340	1,340
TOTAL TRANSFER	6,088	3,419	5,267	6,179	10,397	5,835	5,835
B. Retain in public ownership	453,478	456,147	454,299	453,387	449,169	453,731	453,731
C. Acquire	0	4,960	3,600	2,400	1,640	5,600	5,600
D. Acreage avsilable for right-of-way development							
1. All right-of-way developmeot	455,161	440,365	430,239	455,161	459,566	440,365	440,365
2. Restricted right-of-way developmeot	4,405	4,405	4,405	4,405	0	4,405	4,405
3. Closed to right-of-way developmeot	0	14,796	24,922	0	0	14,796	14,796
MINERALS							
A. Leasable mioerals							
Aa. Oil aod gas							
1. Acrea open to leasiog with staodard stipulatioos	204,511	193,416	180,396	469,188	175,121	161,909	163,723
2. Acrea opeo to leasiog with seasonal occupaocy restrictions	239,315	214,804	174,319	0	264,003	221,519	221,905
3. Acres opeo to leasiog with oo surface occupaocy stipulatioos	31,767	52,577	91,526	6,405	36,469	77,369	89,965
4. Acres closed to leasiog	0	14,796	29,352	0	0	14,796	0
Ab. Geothermal							
1. Acres opeo to leasiog with standard stipulatioos	203,816	191,921	179,701	468,493	173,626	161,214	163,028
2. Acres opeo to leasiog with seasonal occupaocy restrictions	239,315	214,804	174,319	0	264,003	221,519	221,905
3. Acres opeo to leasing with oo surface occupaocy stipulatioos	31,767	52,577	90,726	6,405	36,469	76,569	89,165
4. Acres closed to leasing	0	15,596	30,152	0	800	15,596	800
Ac. Noo-eoergy mioeral leasiog							
1. Acres opeo to leasing with staodard atipulatioos	203,816	191,891	179,701	468,493	174,426	160,848	163,028
2. Acres opeo to leasing with seasonal occupancy reatrictioos	239,315	215,634	174,319	0	264,003	221,885	221,905
3. Acres closed to leasiog	31,767	67,373	120,878	6,405	36,469	92,165	89,965
B. Locatable mioerals							
1. Acres opeo to locatioo	471,962	455,569	438,805	472,794	469,388	455,434	470,233
2. Acres closed to locatioo	2,346	18,789	35,688	1,564	4,970	18,921	4,125
3. Opeo to location but subject to superior rights (Material site, Free Use Permits, etc.)	590	540	405	540	540	540	540
C. Salable mioeral materials							
1. Acres opeo for mioeral material disposals	447,631	408,240	354,735	472,923	439,052	382,888	385,068
2. Acres closed to mioeral material dispoaals	27,267	66,658	120,163	1,975	35,846	92,010	89,830
FOREST MANAGEMENT							
A. Commercial forest laod (CFL)	36,355	36,355	36,355	36,355	36,355	36,355	36,355
1. TPCC set-aside	6,046	6,046	6,046	6,046	6,046	6,046	6,046
2. Set-aside (protectioo of developed recreatioo sites, national scenic trails, etc.)	0	2,583	2,954	15	0	1,444	1,347
3. Total avsilable CFL	30,309	27,726	27,355	30,294	30,309	28,865	28,962
4. Multiple use restrictioos oo forest managemeot	0	2,275	6,066	2,302	0	1,760	1,760
5. Available CFL without restrictioos	30,309	25,451	21,289	27,992	30,309	27,105	27,202
B. Available woodland	26,269	20,755	19,460	26,269	26,269	23,138	23,336
C. Woodlaod closures							
1. Recreation values	0	2,237	622	0	0	622	2,933
2. Wilderness	0	3,277	6,187	0	0	2,509	0
D. Allowable cut (millioo board feet)	1.07	1.07	1.07	1.07	1.07	1.07	1.07
RANGE MANAGEMENT							
A. Areas of use by livestock							
1. Available screage	459,566	459,566	454,674	459,566	459,566	459,566	459,566
2. Closed	0	0	4,892	0	0	0	0
3. Poteotial laod trasofer	5,422	2,766	4,683	5,867	9,983	5,182	5,182
B. Stocking levels (active prefereoce)	63,898	63,898	63,898	63,898	63,898	63,898	63,898
1. Initial (actual use)	52,541	61,910	29,921	53,803	49,589	43,602	43,602
2. % Change from existing*	(-18%) 0%	(-3%) +16%	(-53%) -44%	(-16%) -2%	(-22%) -7%	(-32%) -19%	(-32%) -19%
3. Future (+20 years)	53,633	70,836	37,064	59,129	55,465	52,632	52,632
4. % Chaoge from existing	(-16%) +2%	(+11%) +32%	(-42%) -31%	(-7%) +10%	(-13%) +4%	(-18%) -2%	(-18%) -2%
C. Vegetation commuoities							
1. Ac. poor improved	1,064	0	1,064	1,064	1,064	1,064	1,064
2. Ac. fair improved	1,914	0	55,834	25,576	16,912	21,876	21,876
D. Range improvements							
1. Brush control	1,550	24,606	7,490	14,000	22,700	22,700	22,700
2. Seediog	275	13,438	5,400	17,500	4,400	4,400	4,400
3. Spriogs	10	50	31	30	32	32	32
4. Pipelioes	8	81	58	41	50	50	50
5. Reservoirs	1	9	11	7	4	4	4
6. Feoces	9	101	42	56	63	63	63
7. Total coat	109,791	1,465,290	617,826	683,900	787,947	787,947	787,941
E. Allotmeot categorization							
1. % Maiotaio (M)	16	16	16	16	16	16	16
2. % Improve (I)	55	55	55	55	55	55	55
3. % Custodial (C)	17	17	17	17	17	17	17

*(%) is percent change from active prefereoce.
% is chaoge from actual use.

Management Objective/Action	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F	Alternative G
WILDLIFE							
A. AUM's (cattle equiv.) of use							
1. Elk	2,182	980	3,124	946	1,296	2,407	2,407
2. Mule deer	2,767	1,800	3,878	2,185	3,125	3,463	3,463
3. Antelope	450	351	474	300	419	474	474
4. Bighorn sheep	0	0	246	0	80	122	122
B. Wildlife habitat improvements							
1. Prescribed burns	0	5,500	7,360	0	3,705	7,360	7,360
2. Pipelines (to augment guzzlers)	0	1	6	1	2	6	6
3. Fences							
3a. Construction (miles)	0	2	5	1	2	6	6
3b. Modification (miles)	30	75	154	40	101	154	154
4. Guzzlers	4	5	18	5	9	18	18
C. Management actions							
1. Minerals no surface occupancy to protect important habitats	0	69,057	85,800	0	29,540	69,057	69,057
2. Restricted timber management/harvest	0	2,305	5,156	1,646	591	1,179	1,179
3. Restricted livestock	0	0	48,000	15,900	8,800	8,800	8,800
4. Seasonal use restrictions (minerals related)	240,000	223,400	196,900	0	269,460	223,400	223,400
5. State land acquisition	0	4,360	4,960	1,920	1,160	4,960	4,960
6. Private land acquisition	0	600	640	480	480	640	640
7. Off-road vehicle restriction	16,200	0	16,200	0	0	16,200	16,200
WATERSHED AND FISHERIES							
A. Miles of stream managed primarily for riparian habitat improvement, water quality protection	0	9.5	22	11.5	11.5	15.5	15.5
B. Acres of riparian area in unsatisfactory condition that would be managed for improvement	0	138	5,100	167	167	500	500
C. Acres of unsatisfactory condition watershed that would be improved to a satisfactory condition	0	0	10,430	0	0	1,494	1,494
D. Miles of stream habitat improvement	0.0	3.0	5.0	3.0	3.0	3.0	3.0
E. Miles of stream maintained in present condition	97.7	94.7	92.7	94.7	94.7	94.7	94.7
RECREATION MANAGEMENT							
A. Off-road vehicle designations							
1. Open	426,696	424,514	418,414	459,566	443,336	428,540	430,722
2. Limited	16,230	16,230	16,230	0	16,230	16,230	16,230
3. Closed	16,640	18,822	24,922	0	0	14,796	12,614
B. Recreation opportunity spectrum classes							
1. Primitive	3,840	3,840	3,840	0	0	3,840	3,840
2. Semi-primitive non-motorized	12,800	14,982	21,082	0	0	10,956	8,774
3. Semi-primitive motorized	17,280	15,098	8,998	0	0	19,124	21,306
4. Roaded natural	416,371	416,371	416,371	450,291	450,291	416,371	416,371
5. Rural	9,275	9,275	9,275	9,275	9,275	9,275	9,275
C. Special designations							
1. salmon river SRMA*	4,405	4,405	4,405	4,405	4,405	4,405	4,405
2. Continental Divide National Scenic Trail SRMA*	4,600	4,600	8,200	4,600	4,600	4,600	4,600
3. Lewis and Clark National Historic Trail SRMA*	1,800	9,080	9,080	1,800	2,810	9,080	9,080
D. Visual resource management classes							
1. Class I	29,327	14,796	38,407	0	4,405	14,796	0
2. Class II	15,720	32,805	22,920	0	18,530	29,280	30,280
3. Class III	183,200	180,880	180,680	203,325	182,515	184,205	184,205
4. Class IV	231,319	231,085	217,559	256,241	254,116	231,285	245,081
E. Developed recreation sites	7	9	9	7	9	9	9
WILDERNESS							
A. WSA recommendation							
1. Suitable	0	14,796	24,922	0	0	14,796	0
2. Nonsuitable	24,922	10,126	0	24,922	24,922	10,126	24,922
FIRE MANAGEMENT							
A. Suppression restrictions	0	14,796	24,922	0	0	14,796	0
B. Prescribed fire areas	3,200	35,115	11,520	18,450	22,075	30,078	30,578
C. Full suppression	459,566	444,770	434,644	459,566	459,566	444,770	456,366
D. Limited suppression	0	0	0	0	0	0	0
E. Hazard reduction	1,000	10,000	10,000	10,000	10,000	10,000	10,000
CULTURAL							
A. Withdrawals							
1. Lewis and Clark Trail	0	1,820	2,810	0	2,810	1,820	1,820
2. Indian Head	0	0	40	0	40	0	0
3. Hawley Creek	0	0	440	0	0	0	0
4. Indian Area A	0	120	120	120	120	120	120
5. Indian Area B	0	120	1,040	40	120	120	120
6. Salmon River Corridor	0	0	4,405	0	0	0	0
7. Chief Tendoy Cemetery Add-on	0	40	120	0	80	80	80
B. Already withdrawn							
1. Chief Tendoy Cemetery	40	40	40	40	40	40	40
C. No surface occupancy							
1. Lewis and Clark Trail	0	0	2,810	0	2,810	1,820	1,820
2. Chief Tendoy Cemetery	40	160	320	40	160	160	160
3. Indian Head	0	40	40	0	40	40	40
4. Hawley Creek	0	440	440	0	440	440	440
5. Indian Area A	0	120	120	120	120	120	120
6. Indian Area B	0	760	1,040	40	760	880	880
7. Gilmore Pittsburg Railroad	0	300	300	0	300	300	300
8. Salmon River Corridor	0	4,405	4,405	0	4,405	4,405	4,405

*(SRMA) = Special Recreation Management Area

Introduction

This Proposed Lemhi Resource Management Plan (RMP) and Environmental Impact Statement (EIS) uses an abbreviated format. This proposed Lemhi RMP is the land use plan that BLM proposes for the resource area for the next 15 to 20 years. BLM considered all of the comments received by letter and the public hearing and made a thorough review of the Draft RMP/EIS. Alternative F, with some minor additions and corrections, was chosen as the Proposed Plan for the area.

A portion of the Ellis Planning Unit (Approximately 40,000 Acres) is now a part of the Lemhi Resource Area. The entire Ellis-Pahsimeroi area was recently covered by the Ellis-Pahsimeroi Management Framework Plan and Environmental Impact Statement (1982). Since that plan is still current, the BLM has not developed or analyzed a new plan for that portion of the Ellis Planning Unit which is now in the Lemhi Resource Area.

The Lemhi RMP is being prepared under the authority of and in accordance with Sections 201 and 202 of the Federal Land Policy and Management Act of 1976 (Public Law 94-579, FLPMA). Further, pursuant to Section 603 of FLPMA, this document contains a preliminary wilderness suitability recommendation for the Eighteenmile Wilderness Study Area (WSA) located within the planning area boundary. For this WSA, this document will make only preliminary recommendations as to its suitability or nonsuitability for inclusion into the National Wilderness Preservation System. This recommendation will be reported through the Director of the BLM, the Secretary of the Interior, and the President to Congress. The final decision on suitability or nonsuitability of the WSA will be made by Congress. A separate Final Environmental Impact Statement will be prepared for the Eighteenmile WSA.

This document also serves as the instrument to satisfy the intent of the 1975 U.S. District Court approved agreement (Case 1983-73) between BLM and the Natural Resources Defense Council et al., in which BLM agreed to consider the impacts of various intensities of livestock grazing in its decision-making process. Livestock grazing has been identified as one of the planning issues. This issue is addressed in the land use plan and considered in the EIS.

GENERAL LOCATION MAP

Plan Approval

The Lemhi RMP will be approved by the State Director no sooner than 30 days after the Environmental Protection Agency (EPA) publishes a notice of filing of the final EIS in the Federal Register and pending final action on any protest that may be filed. Approval will be withheld on any portion of the RMP being protested until final resolution has been completed on such protest. Before the RMP is approved, public notice will be given if there is a significant change made to the proposed Lemhi RMP and the public will have the opportunity to comment on the change. Approval of the RMP will be documented in a record of decision meeting the requirements of the National Environmental Policy Act of 1969 (NEPA).

Protest Provision

The procedures for raising a protest about the proposed Lemhi RMP are contained in 43 CFR 1610.5-2, which is reprinted in its entirety below:

1610.5-2 Protest procedures.

(a) Any person who participated in the planning process and has an interest which is or may be adversely affected by the approval or amendment of a resource management plan may protest such approval or amendment. A protest may raise only those issues which were submitted for the record during the planning process.

(1) The protest shall be in writing and shall be filed with the Director. The protest shall be filed within 30 days of the date the Environmental Protection Agency published the notice of receipt of the final environmental impact statement containing the plan or amendment in the Federal Register. For an amendment not requiring the preparation of an environmental impact statement, the protest shall be filed within 30 days of the publication of the notice of its effective date.

(2) The protest shall contain:

(i) The name, mailing address, telephone number and interest of the person filing the protest;

(ii) A statement of the issue or issues being protested;

(iii) A statement of the part or parts of the plan or amendment being protested;

(iv) A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the record; and

(v) A concise statement explaining why the State Director's decision is believed to be wrong.

(3) The Director shall promptly render a decision on the protest. The decision shall be in writing and shall set forth the reasons for the decision. The decision shall be sent to the protesting party by certified mail, return receipt requested.

(b) The decision of the Director shall be the final decision of the Department of the Interior.

Protests should be filed with the Director (202), Bureau of Land Management, U.S. Department of the Interior, Washington, D.C. 20240.

Governor's Review

The Governor of the State of Idaho has an opportunity to review this Lemhi RMP for consistency with State and local plans, policies, and programs. The Governor has 60 days from the date this document is filed with EPA to identify any inconsistencies and provide written recommendations to the State Director, Bureau of Land Management, 3380 Americana Terrace, Boise, Idaho 83706.

Note that recommendations on wilderness study areas (WSAs) may not be protested since BLM and the Secretary of the Interior are merely making recommendations to the President. Protests on these recommendations will be returned to the protesting party.

Final Wilderness EIS

Only Congress can add an area to the National Wilderness Preservation System. The BLM and the Secretary of the Interior make suitability recommendations to the President, who in turn makes recommendations to Congress.

A separate final wilderness EIS and a wilderness study report for each WSA will be prepared for the suitability recommendations made in the Lemhi RMP. It will contain a detailed analysis and rationale for the suitability recommendations. All individuals and organizations on the Lemhi RMP mailing list will receive a copy of the final wilderness EIS.

Changes in the Proposed Plan

The following changes were made between Alternative F, published September 1985 in the Draft RMP, and the Proposed Plan:

The target number of deer managed for under Alternatives F and G were changed from 10,113 deer to 9,350 deer. This portion changed the forage demand for deer from 3,746 AUMs to 3,463 AUMs and changed total forage demand from 6,749 AUMs to 6,466 AUMs.

The following are changes to the text concerning plant species that are candidates for inclusion to the list of Threatened and Endangered Plants:

1. Draft RMP page 50: Table 2 shows species and areas where all management activities will be analyzed for possible impacts during the writing of any activity plans or environmental assessments.

TABLE 2
T & E PLANT MANAGEMENT CONSIDERATIONS

Species	Area
Physaria didymocarpa var. lyrata	Williams Creek
	Pattee Creek
	Basin Creek
	Trail Creek
	Agency Creek
Astragalus scaphoides	Agency Creek

The only activity that would seriously impact Penstemon lemhiensis is herbicide spraying, particularly along roads. An analysis of impacts to populations of this species will be done if herbicide spraying is proposed.

2. Draft RMP page 18: Physaria didymocarpa var. lyrata is presently listed as a candidate federally endangered species. A monitoring plan has been developed in conjunction with the U.S. Fish and Wildlife Service at the Williams Creek shale pit site. An ongoing inventory of potential sites is being conducted in hopes of locating other populations of this rare plant.

Penstemon lemhiensis is presently listed as a candidate federally threatened species. It has been identified along many roads within the RMP area. Herbicide spraying along roads is the only activity that could seriously impact this species.

Astragalus scaphoides has only recently been considered as a proposed federally endangered species. Any future management will consider impacts to this species.

3. Appendix 1: Resource Monitoring and Evaluation Plan

Element	Item	Location	Technique	Unit of Measure
Threatened & Endangered Physaria didymocarpa var. lyrata	Population Dynamics	Williams Cr. gravel pit	Slope Stability panoramic photo points	Population density & frequency

Frequency	Information Warranting A Decision Change	Annual Cost
Annually	Downward Population Trends	$3000

Minor text changes are listed on the Correction Sheet at the end of this document.

Format

The items discussed in the Proposed Resource Management Plan are presented in the following format order:

1. Description of the Planning Area.
2. Planning Process.
3. Planning Issues, Scoping, and Planning Criteria.
4. Management Actions or Concerns Common to All Alternatives.
5. Questions and Concerns Not Addressed.
6. Multiple Use and Transfer Classes.
7. The Proposed Management Prescription.
8. Selection of the Proposed Plan.
9. Standard Operating Procedures.
10. Support Requirements.
11. Consistency with Other Plans.
12. Monitoring and Evaluation.
13. Corrections.
14. Public Review and Comments.
    - Public Hearing
    - Public Hearing Responses
    - Comment Letters
    - Comment Letter Responses
15. Appendix.

DESCRIPTION OF THE PLANNING AREA

The Lemhi Resource Area is located in south-central Idaho and encompasses 459,566 acres of public land (see Location Map 1). The area includes the lands surrounding the town of Salmon in the northern end of the Salmon District and then stretches to the southeast along the Lemhi River Valley and the upper reaches of Birch Creek, joining the Idaho Falls District at the Clark/Butte County line. The Lemhi and Salmon rivers run through the area. The Salmon River provides recreational use such as fishing, boating and camping. The Lemhi River is essentially all on private land.

Elevation varies from 4,000 feet at Salmon to 11,000 feet along the Montana line. The climate varies from semi-arid to sub-humid. Precipitation varies from 9 inches at Salmon to 22 inches at higher elevations and occurs mostly during winter and spring.

Most of the public lands are dry grazing lands. These dry grazing lands are for the most part marginal for agricultural development and are left over from Homestead Act and Desert Land Act settlement. Livestock use the public land during spring, summer, and fall.

The total population in the area is about 6,000. The area's largest communities are Salmon (population 3,303) and Leadore (population 114). During the summer months Salmon and Lemhi County experience a noticeable population increase. Summer homes; government, timber and recreation jobs; and recreation use results in a large influx of people.

Agriculture and agriculture related industries provide the base for the local economy. Agriculture is mainly livestock grazing. Beef cattle numbers remain relatively constant in Lemhi County, fluctuating between 30,000 and 32,000 brood cows. Also significantly contributing to the economy are recreational activities such as hunting, fishing, camping, river floating, and off-road vehicle use.

PLANNING PROCESS

The planning process described in the BLM Planning Regulations 43 CFR 1600 contains nine steps. These are described below and illustrated in Figure 1:

1. Identification of Issues

   Each BLM resource area has different problems, needs, and resource uses. At the very beginning of the planning process, BLM listens to citizens' suggestions regarding development and protection of the area's resources. At this stage, BLM needs the public to help determine the issues and their importance. These issues then become important to the planning effort and are considered in each step of the process. The issues and conflicts are not resolved at this step, but it is important for the BLM to hear specific comments.

2. Development of Planning Criteria

   Once the issues have been identified, the District Manager prepares criteria to guide development of the plan. These criteria are used to guide the gathering of information and, later, to formulate and evaluate alternatives. The criteria are published for public comment before they are adopted by the District Manager.

3. Inventory and Information Collection

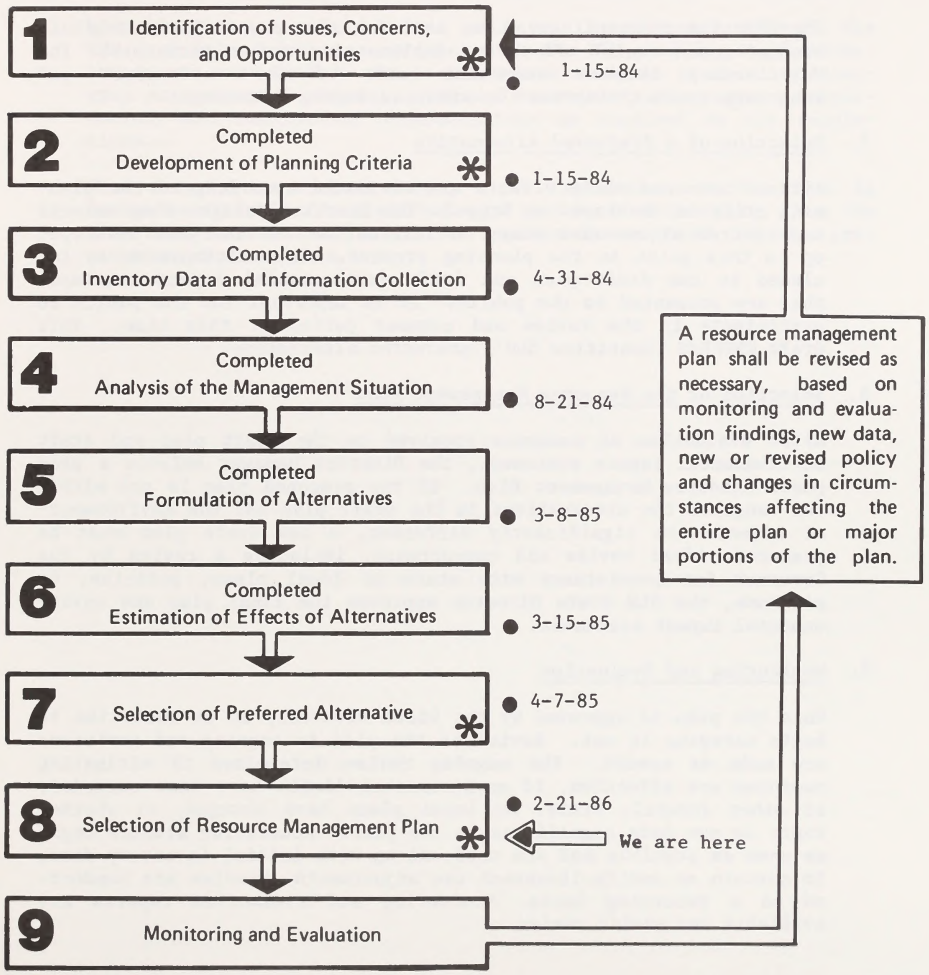
   The BLM planning team needs to know the present condition of the resources in the area and their past production levels. The District Manager arranges for the district staff to collect and assemble this information. The BLM appreciates public contributions of information.

4. Analysis of the Management Situation

   The planning team assesses the capability of the public land resources to respond to the needs, concerns, and opportunities previously identified through public participation. BLM policy and the policies, plans, and programs of other federal agencies, state and local governments, and Indian tribes also play a role in this analysis. The Analysis of the Management Situation for the Lemhi Planning Area is located in the Salmon District Office.

Figure 1

STEPS IN THE RESOURCE MANAGEMENT PLANNING PROCESS



* Steps Requiring Public Participation

● Date Completed

5. Formulation of the Alternatives

Several alternative plans are prepared that range from emphasizing production of resources to favoring protection of resources, including continuation of present management. Each alternative must be a complete plan for managing the resources in the planning area. Public comments help identify conflicts among the alternatives.

6. Effects of the Alternatives

The BLM interdisciplinary team analyzes the physical, biological, economic, and social effects of implementing each alternative. The relationship between short-term uses of the environment and long-term productivity must be analyzed during this step.

7. Selection of a Preferred Alternative

Alternatives and their effects are evaluated according to the planning criteria developed in Step 2. The District Manager then selects a preferred alternative based on information and analysis developed up to this point in the planning process. This alternative is included in the draft plan and draft environmental impact statement that are presented to the public. It is important for the public to participate in the review and comment period at this time. This draft RMP/EIS identifies BLM's preferred alternative.

8. Selection of the Resource Management Plan

After evaluation of comments received on the draft plan and draft environmental impact statement, the District Manager selects a proposed Resource Management Plan. If the proposed plan is not within the range of the alternatives in the draft plan and the environmental effects are significantly different, a new draft plan must be prepared. After review and concurrence, including a review by the Governor for consistency with state or local plans, policies, or programs, the BLM State Director approves the final plan and environmental impact statement.

9. Monitoring and Evaluation

Once the plan is approved by the State Director, it is then time to begin carrying it out. Review of the plan is ongoing and revisions are made as needed. The ongoing review determines if mitigating measures are effective, if environmental limits have been exceeded, if other federal, state, or local plans have changed, or whether there is new data significant to the plan. Monitoring studies begin as soon as possible and are used, along with initial inventory data, to sustain or modify livestock use adjustments. Studies are conducted on a recurring basis. Monitoring and evaluation reports are available for public review.

10. Maintenance, Amendment, and Revision

Resource management plans are updated to reflect minor changes in data and further refinement or documentation of the approved plan. Maintenance does not result in expansion of the scope of resource uses, or restrictions or in changes in the terms, conditions, or decisions of the approved plan. Maintenance does not require formal public involvement, interagency coordination, or the preparation of environmental analysis documents.

When changes are required that go beyond routine maintenance, the RMP must be amended in accordance with the BLM planning regulations. Amendments must include the environmental analysis process to determine environmental impacts, public involvement, interagency coordination, and consistency determinations as required by the regulations.

When changing conditions (e.g., major improvements or declines in forage condition) affect all or major portions of the plan, then the plan must be revised, using the regulations required for the preparation of a new plan.

Issue-Driven Planning and Scoping

The BLM planning regulations generally equate land use planning with problem solving or with issue resolution. An issue may be defined as an opportunity, conflict, or problem regarding the use or management of public lands and resources. Not all issues can be resolved through land use planning. They may instead require changes in policy, budgets, or legislation.

Scoping

The Lemhi Resource Management Plan (RMP) addresses public issues and management concerns related to public land management in the planning area. An initial list of issues and concerns was developed by the resource area staff. This list was submitted to the Multiple Use Advisory Council and the Grazing Advisory Board. It was also published in the local newspaper and mailed to all other known interested parties. Comments were solicited from all of these parties as well as from a variety of informal public contacts. From this initial list of issues and public comments, similar items were combined and agency management concerns were incorporated to avoid duplication. The result was nine planning issues that the Lemhi RMP will address. These nine issues have been used to establish the scope of this RMP.

It is important to understand that issues brought to BLM's attention by the public involve value judgements or personal preferences. This frequently results in differing or opposing views of public land management. These different ways of looking at public land management are reflected in the various alternatives, which are described and analyzed later in this document.

Some of the issues identified by the public were not considered in the RMP. These are issues that do not require a land use decision. These issues may be handled through routine administrative channels. An example of an issue that was brought to BLM's attention and will not be included in this RMP is that "trespass land uses should be identified". Resolution of this issue involves an administrative decision, adequate funding, and commitment of manpower.

All public input relative to the Lemhi RMP has been documented and filed. It is available for examination at the Bureau's Salmon District Office, Lemhi Resource Area.

Planning Criteria

Planning criteria are the factors or data that BLM must consider prior to arriving at a land use decision relative to any issue. The following are the factors that have been used in arriving at decisions in the RMP:

1. Social and economic values.

2. Plans, programs, and policies of other federal agencies, state and local governments, and Indian tribes.

3. Existing law, regulations, and BLM policy.

4. Future needs and demand for existing or potential resource commodities and values.

5. Public input.

6. Public welfare and safety.

7. Past and present use of public and adjacent lands.

8. Public benefits of providing goods and services in relation to costs.

9. Quantity and quality of noncommodity resource values.

10. Environmental impacts.

Issues Addressed in the Lemhi RMP

Nine issues are addressed in this document. These issues were identified based on planning team members' judgement, interagency consultation, public input, and review by BLM managers.

The following discussions present a brief overview of the issues included in the alternatives. The alternatives are found in Part II, Chapter 2 and analyzed in Part II, Chapter 4 of the Draft RMP/EIS.

1. Land Tenure Adjustment

The Issue

How should disposal or retention of public lands be managed?

Background

Land patterns in the Lemhi Area are such that public and private lands are interspersed, resulting in access and management problems. In addition, there is a need to review the public lands for agricultural development and community expansion. The transfer of public lands to private ownership could reduce natural wildlife habitat, reduce acreage available for livestock grazing, and affect recreational uses on the public lands. Administrative efficiency could be improved by disposing of unmanageable parcels of public land.

Criteria

Public land disposals involving either public sale or exchange must meet the criteria in Sections 203 and 206 of the Federal Land Policy and Management Act.

In accordance with Section 102(a)(1) of the Federal Land Policy and Management Act, "The public lands shall be retained in Federal ownership, unless as a result of the land use planning...it is determined that disposal of a particular parcel will serve the national interest..."

Lands falling within any of the following criteria will not be considered for disposal:

a. Public lands having value for mineral and energy production, except as provided for under Section 209 of FLPMA and the 1872 mining laws.

b. Public lands providing habitat essential to the continued survival of threatened or endangered species.

c. National Register Sites or sites that have been formally proposed for inclusion on the National Register (and sites that may be eligible for the National Register, except that they may be transferred to another agency for management as National Register Sites).

d. Congressional designations or areas being considered for Congressional designation, such as:

   (1) Wilderness study areas and designated wilderness areas.

   (2) National Conservation areas.

   (3) Wild and Scenic Rivers, Study Rivers, or those recommended for study for inclusion.

   (4) National or Historic Trails Systems.

e. Large well-blocked areas of public land.

f. Administrative designations and agreements (except that such designations and agreements may be reconsidered during the planning process) such as:

   (1) Developed recreation sites.

   (2) Administration sites.

   (3) Stock driveways.

2. Energy and Minerals Management

The Issue

a. How will energy and mineral resource development be accommodated?

b. What public land, if any, should be withdrawn from energy and mineral exploration and/or development in order to protect surface and ground water quality, visual quality, wildlife habitat, and other resource values?

Background

The area contains many energy and mineral resources. Exploration and development has been primarily for metallic minerals and coal since the mid-1800's. In more recent years, exploration and development has expanded to other mineral resources including gypsum, phosphates, thorium, oil, gas, and geothermal. These commodities are important to both the local and national economies.

Criteria

The BLM will manage geological, energy, and mineral resources on the public lands. Generally, the public lands are available for exploration and development, subject to applicable regulations and federal and state laws. Geological resources, however, will be managed so that significant scientific, recreational, wildlife, and educational values will be maintained or enhanced.

Areas will be identified where there are major conflicts between energy leasing and other resources. Generally, when these conflicts occur, special studies will be completed to develop protective stipulations (such as seasonal closures) or mitigating measures which would be tailored to the specific conditions and resources affected. These stipulations would be designed to eliminate, or reduce adverse impacts to the resources in conflict with energy leasing. Where adverse impacts to critical resources cannot be adequately mitigated, leasing will be allowed only with a "no surface occupancy" stipulation.

3. Forest Management

The Issue

a. What forest lands are available for intensive forest management?

b. What forest lands should be subject to restricted forest management to protect high recreation, watershed, and wildlife values?

Background

Areas of concern include the McDevitt, Agency, Cow-Yearian Creeks, and Perk Canyon drainages. Wildlife, watershed, and recreation values could be adversely affected by timber harvesting in these areas. However, timber harvesting is a source of income and employment for Lemhi County. The timber cut on BLM-administered lands is currently about 10 percent of the timber cut in Lemhi County.

Criteria

Generally, lands containing commercial timber or other forest products such as firewood, posts and poles, and Christmas trees are available for harvest except where expressly closed by law or regulation. Some areas may also be subject to special restrictions to protect other resource values. All Timber Production Capability Classifications will be reevaluated relative to current BLM Forest Land Policy.

4. Livestock Grazing Management

The Issue

a. How should the range resource be managed to meet existing and future livestock demand?

b. How much and where should forage be designated for livestock and wildlife use?

c. What special management techniques should be initiated on livestock grazing to improve sensitive areas?

Background

Continuation of past and present livestock management practices concerns many people. Adjustments of livestock grazing, including potential reduction in grazing could reduce the income and disrupt the lifestyles of the ranchers involved, their families, and communities.

Thirty percent of the resource area is in fair and poor ecological condition; the other 70 percent is in good ecological condition. Most of the fair and poor condition range is on the lower elevation range, which is the first part of the allotment used by livestock in the spring. One percent of the resource area has highly erosive soils in fair condition.

Areas of concern are riparian areas such as the McDevitt Creek, Basin Creek, and Pattee Creek drainages, where livestock and wildlife compete for forage and space. Livestock use levels and season of use are the main concerns in these areas.

Criteria

The following factors are to be considered in setting livestock use levels and establishing basic management:

a. The economic stability of the local livestock industry in Lemhi County must be considered.

b. Plant vigor maintenance requirements, as well as watershed and riparian area protection and stability requirements, must be met.

c. The Bureau will provide habitat, including forage, for wildlife on public land. The amount of forage provided is determined by BLM through consultation with the Idaho Department of Fish and Game and public land users.

5. Wildlife Habitat Management

The Issue

a. How should fisheries habitat and seasonal range for big game and sage grouse be managed?

b. How should disposal of public lands containing important wildlife habitat be handled?

c. How should habitat for threatened and endangered species be managed?

Background

The Lemhi Resource Area contains a rich diversity of aquatic and terrestrial wildlife habitat. Hunting and fishing are extremely important to the local economy. Wildlife populations can be threatened when habitat is used for livestock grazing, timber harvesting, or other uses. These land use activities, however, are important to the people of Lemhi County as a source of jobs and income.

Criteria

BLM will manage fish and wildlife habitat on the public lands. A variety of methods may be employed, including the use of management actions designed to maintain or improve wildlife habitat, inclusion of stipulations or conditions in BLM leases, granting of licenses and permits, and development of detailed plans for fish and wildlife habitat management. Priority will be given to threatened or endangered species habitat. All BLM management actions will comply with federal and state laws concerning fish and wildlife.

6. Watershed

The Issue

a. How should BLM deal with riparian area degradation due to livestock grazing?

b. How should BLM address water quality and fisheries habitat degradation due to forestry practices?

c. How should the problem of early spring turnout and overgrazing by livestock on highly erosive, low elevation rangeland be handled?

Background

Areas of concern include most riparian areas within the Lemhi Resource Area and low elevation ranges typically dominated by highly erosive soils. These areas are the first impacted by livestock each grazing season or are the most susceptible to damage.

Reductions in water quality and fisheries habitat as a result of logging practices and roading is a problem within watersheds having a commercial forest base. Lack of both tree seedling regeneration and establishment of vegetation in general because of livestock use following timber sale harvesting is also a concern.

Criteria

Executive Order 11990 states that BLM will avoid long and short-term adverse impacts associated with destruction, loss, or degradation of wetland-riparian areas. The BLM must also ensure the preservation and enhancement of "the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage." A variety of methods may be employed, including the use of management actions designed to maintain or improve riparian habitat, inclusions of stipulations or conditions in BLM leases, granting of licenses and permits, and development of detailed plans for watershed management.

7. Recreation Management

The Issue

a. How should BLM address the overcrowding of existing recreational facilities and the deterioration in the quality of recreational experiences in the Lemhi Resource Area?

b. What management practices should occur within areas of national significance?

Background

Recreation in the area is primarily centered around the Lemhi and Salmon rivers. The increasing popularity of float boating and the improvement of the steelhead fishery has attracted, and continues to attract, increasing numbers of visitors. Increased recreational use pressures are affecting public recreation opportunities because of space, access, and facility limitations. There is a need to identify recreation sites for development and areas for access acquisition.

The Lewis and Clark Trail and the Continental Divide Trail are of national significance and have been designated by Congress as parts of the National Trail System. The Salmon River from its headwaters to North Fork, Idaho, has been identified as a potential Wild and Scenic Study River. All of these areas are managed as special recreation management areas by BLM.

Criteria

The BLM will manage recreation on the public lands. A variety of ways to maintain or improve recreation opportunities will be considered. Some areas may be subject to special restrictions to protect resources or eliminate or reduce conflicts among uses.

The BLM may develop and maintain various recreation facilities on the public lands, including campgrounds, picnic areas, and boat launches. These recreation facilities would be provided to meet existing or anticipated demand.

All rivers on the Nationwide River Inventory will be evaluated as suitable or nonsuitable for addition to the National River System. Criteria for the evaluation are the guidelines prepared by the Secretaries of Interior and Agriculture in 1970.

8. Off-Road Vehicle (ORV) Management

The Issue

Which areas should be designated as open, limited, or closed?

Background

Off-road vehicle use east of Salmon in the vicinity of the existing motor-cross track and cross-country course conflicts with existing livestock grazing and past mining activity. In the Agency, Pattee, and McDevitt Creek drainages, snowmobile use may disturb big game on their crucial winter ranges.

Off-road vehicle use is a popular activity in the area. However, unrestricted ORV use could create conflicts with watershed management, wildlife habitat, livestock management, and recreational uses. Designation of open, limited, or closed areas of ORV use could protect resource values at risk.

Criteria

Where control of ORV use is required, public lands will be designated as either open, limited, or closed to motorized vehicles. In making these determinations BLM will consider the following:

a. Public safety.

b. Conflict resolution.

c. Resource protection requirements.

d. User access requirements.

9. Wilderness Suitability

The Issue

Should the Eighteenmile Wilderness Study Area (WSA) or any portion of the WSA be recommended as suitable or nonsuitable for wilderness designation?

Background

The Eighteenmile area has been identified as a wilderness study area (WSA). This indicates it meets the legal requirements for wilderness characteristics: it contains a minimum of 5,000 acres, is in a near natural state, and possesses outstanding opportunities for solitude or primitive and unconfined recreation. The area adjoins lands in the Salmon, Targhee, and Beaverhead forests that are being studied for wilderness suitability (Italian Peak, XI-1945). All of the WSA has been leased for oil and gas. Other known minerals found in the WSA include phosphates and gypsum. Several areas of commercial timber have been identified. A wilderness decision by Congress will determine the potential for development of existing resources.

Criteria

A recommendation for preservation as wilderness or nonwilderness must be based on an environmental analysis of the designation/nondesignation impacts.

Fire Management

Develop a fire management plan for the Lemhi Resource Area and maintain vegetation types based on:

1. Capability of the land for improvement through fire manipulation.

2. Protection of certain public and private lands (e.g., critical wildlife and watershed areas, cultural resources, privately owned structures such as homes, oil and gas pumping stations, etc.).

3. Need to change plant communities to a subclimax vegetation, primarily for the benefit of livestock and wildlife forage, as well as to improve watershed conditions.

4. Economic impacts of any fire management alternatives.

Cultural Resource Management

The BLM will manage cultural resources so that representative samples of the full array of scientific and socio-cultural values are maintained consistent with state and federal laws.

The Lemhi Valley has special cultural resource significance because of the high socio-cultural value the Lemhi Shoshone place on the area as a significant part of their heritage. The American Indian Religious Freedom Act (P.L. 95-341) emphasizes considering the impact of federal policies and procedures on American Indian religious freedoms. Many of the tribal members now residing on the Fort Hall Reservation, as well as the local Lemhi Indians, are descendants of the Sheepeater or Mountain Shoshoni and the Lemhi Indians who resided in the Lemhi River Valley until the reservation at Lemhi was closed and most moved to Fort Hall in 1907. The values, memories, and traditions attached to the Lemhi River Valley by these Indians are as important as the material remains themselves.

Significant sites or districts will continue to be managed for their cultural resource values. Management will emphasize appropriate site use through the development of specific management plans which identify cultural resource protection and use objectives, establish the actions BLM must take to achieve its objectives, and outline procedures for evaluating accomplishments.

During the planning process there has been consultation with the Idaho State Historic Preservation Office (SHPO).

Noxious Weeds

Control of noxious weeds is an important management concern. Especially important is Leafy Spurge (Euporbia esula), which has infected the area from Kirtley Creek to Badger Springs. Leafy Spurge is a very persistent

perennial that spreads both vegetatively and by seeding. It is difficult and expensive to control and is readily spread by livestock and wildlife. It is the most persistent weed known of all the weeds capable of growing in this climatic area. BLM policy is to control noxious weeds and BLM has prepared the "Idaho Noxious Weed Control Environmental Assessment" and "Northwest Area Noxious Weed Control Program EIS." Control of noxious weeds will be accomplished through close coordination and cooperation with Lemhi County and the Lemhi County Agent.

As stated in the "Idaho Noxious Weed Control Environmental Assessment" the purpose of weed control is twofold:

1. To reduce present and future economic losses to ranchers, farmers, and the general public caused by reduced crop yields, lowered rangeland productivity, and costly weed control efforts. These losses could be reduced by controlling the designated noxious weeds on public lands.

2. To comply with state and federal laws. Federal law restricts interstate shipping of contaminated products and addresses itself to weed control efforts. These losses could be reduced by controlling the designated noxious weeds on public lands.

The BLM is responsible for implementing the proposed weed control program on public land and may do so through cooperative agreements with county weed control districts. The Idaho Department of Agriculture is responsible for coordinating weed control activities on federal, state, and private land. Proposed control efforts to minimize infestations of noxious weeds will use an interdisciplinary approach.

The need to control noxious weeds has been recognized by federal and state lawmakers. It is also demonstrated by annual estimated economic losses which could be reduced by an effective weed control program.

As stated in the Standard Operating Procedures noxious weed control will be considered under all alternatives. Individual sites and species (larkspur, Canadian thistle, leafy spurge, etc.) will be handled on a case-by-case basis through the environmental assessment (EA) process. Where biological controls have proven to be effective, they will be used in preference to chemical or mechanical methods.

Threatened and Endangered Plants and Animals

Whenever possible, management activities in habitat for threatened, endangered, or sensitive species will be designed to benefit those species through habitat improvement.

The Idaho Department of Fish and Game and the U.S. Fish and Wildlife Service (USFWS) will be consulted prior to implementing projects that may affect habitat for threatened and endangered species. If a "may affect" situation is determined through the BLM biological assessment process, consultation with the USFWS will be initiated in accordance with Section 7 of the Endangered Species Act of 1973, as amended.

The BLM is aware of the presence of three listed species (gray wolf, peregrine falcon, and bald eagle) in the Lemhi Resource Area. Also, several plants are listed as candidate species. Therefore, BLM has consulted with the USFWS throughout the Lemhi RMP process and will continue to coordinate with the USFWS.

Physaria didymocarpa var. lyrata is presently listed as a candidate federally endangered species. A monitoring plan has been developed in conjunction with the U.S. Fish and Wildlife Service at the Williams Creek shale pit site. An ongoing inventory of potential sites is being conducted in hopes of locating other populations of this rare plant.

Penstemon lemhiensis is presently listed as a candidate federally threatened species. It has been identified along many roads within the RMP area. Herbicide spraying along roads is the only activity that could seriously impact this species.

Astragalus scaphoides has only recently been considered as a proposed federally endangered species. Any future management will consider impacts to this species.

QUESTIONS AND CONCERNS NOT ADDRESSED

The following questions and management concerns were considered but not analyzed in the planning process.

1. "Access for minerals and energy exploration is a concern. Conflicts exist where roads to public lands cross private land."

   The access concern cannot be addressed in alternative levels (proposed levels of management action). The resource area staff will continue to work with those landowners who own lands which block access to large parcels of public land. Negotiations to obtain an access easement where needed to manage the public lands will be sought. In some cases, the guarantee of total public access onto or through private lands may not be possible.

2. "Utility Corridors may be needed for future development."

   Should area growth require additional transmission lines, there are regulations and BLM procedures that will allow for this.

3. "Trespass land uses should be identified".

   The resolution of trespass will be considered a priority within the constraints of funding. An inventory will be done to determine areas being used in trespass. The cases will be reviewed to determine if the trespass should be authorized or terminated based on the long-term planning for the area.

4. "What opportunities exist for blocking state and federal lands?"

   The current Idaho BLM policy and directives require development of a statewide program, in coordination with the state of Idaho, to identify opportunities for blocking and the process for the blocking of both state and BLM lands. An amendment would be prepared on this action and incorporated into those plans in effect, including this RMP, at the time of approval.

5. "Are there any Areas of Critical Environmental Concern (ACECs)?"

   There are no identified ACECs in the resource area. If such areas are identified in the future and their resource values cannot be protected through other management techniques, ACEC designation will be proposed and a plan amendment completed for the Lemhi RMP.

MULTIPLE USE AND TRANSFER CLASSES

The Lemhi RMP Area has been broken down into the following multiple use or transfer classes: intensive use, moderate use, limited use, or transfer. Multiple use and transfer classes are general planning categories included in Idaho RMPs to provide statewide consistency and uniformity.

Multiple use and transfer classes serve two purposes in this plan. The first is to describe overall opportunities and constraints by indicating what level of resource production and use is appropriate, what intensity of management is needed, whether there are sensitive and significant resources that must be protected, and whether BLM would consider transfer of public lands from its jurisdiction. The second purpose is to provide a basis for considering unexpected proposals by supplementing the detailed resource management objectives and required actions established for the resource area with general purpose and policy statements. This feature is intended to help keep the plan responsive to future demands and to reduce the number of future plan amendments that otherwise might be needed.

Prior to undertaking or approving any proposed resource management action on public lands in the resource area, BLM will ensure that such action is consistent with the purposes and policies of the multiple use or transfer class or classes involved.

The multiple use classes assigned to the RMP area are shown on Map 3. Map 3 illustrates all of the potential transfer classes. Public lands are placed in the multiple use or transfer class that best reflects the specific resources and management priorities for the area. The multiple use and transfer classes described for the RMP area pertain only to the surface acreage managed by the BLM. A description of these classes and their purposes and policies is given in the following sections:

Moderate Use Class

A total of 140,047 acres are classified as moderate use in this RMP.

Purpose

The purpose of a moderate use class is to delineate public lands that are suitable for a wide variety of existing and potential uses.

Policy

The first priority for managing a moderate use class is to provide for the production or use of forage, timber, minerals and energy, recreation, or other consumptive resources while maintaining or enhancing natural systems. These areas will be managed for a moderate intensity of use and will generally be available for production and use of consumptive resources, subject to BLM standard operating procedures and other controls as needed. Sensitive and significant resource values, however, will be protected consistent with federal and state law. Public lands in a moderate use class will be retained in federal ownership.

Limited Use Class

A total of 313,684 acres are classified as limited use in this RMP.

Purpose

The purpose of a limited use class is to delineate public lands where strict environmental controls are required to protect sensitive and significant resources.

Policy

The first priority for managing a limited use class is to protect key wildlife habitat, scenic values, wilderness, cultural resources, watershed, and other sensitive and significant resources while providing for other compatible uses. These areas will be managed for relatively low intensities of use and with strict environmental controls to protect sensitive and significant values. A limited use class may be closed to or contain restrictions on off-road vehicle use, mineral and energy exploration and development, forest management practices, location of utility corridors and installations, and livestock grazing. Because of the relatively significant environmental considerations in these areas, some uses may not be permitted. Special attention will be given to finding appropriate locations for compatible uses. Public lands in a limited use class will be retained in federal ownership.

Intensive Use/Development Class

The following nine recreation sites are classified as intensive management sites:

Existing	Proposed
Tower Rock	Elevenmile
Morgan Bar	Camp Creek
Shoup Bridge	
Williams Lake	
Agency Creek	
McFarland	
Smokey's Cubs	

Purpose

The purpose of an intensive use/development class is to delineate areas suitable for large-scale intensive use and development.

Policy

The first priority for managing an intensive use/development class is to provide for existing and projected demands for large-scale intensive use and development. Intensive use areas are generally reserved for major recreation sites or facilities, off-road vehicle intensive use areas, large-scale mineral or energy extraction operations, military use areas, or major utility installations. These areas will be managed for a high intensity of use. Because of the potential for conflict with other uses in these areas, some uses may not be permitted. Protection of sensitive and significant resources, however, will be ensured, consistent with federal and state law. Public lands in an intensive use/development class will be retained in federal ownership.

Transfer Class

A total of 5,835 acres are classified for transfer in this RMP.

Purpose

The purpose of a transfer class is to delineate public lands that may be considered for transfer out of federal ownership.

Policy

The transfer class is the class in which public lands may be transferred out of federal ownership under this plan. Public lands declared eligible for transfer by their inclusion in this category are subject to detailed consideration prior to the final decision regarding transfer. Transfer classes are delineated in response to specific developments, community expansion, and other transfers, including transfers to the state of Idaho. Transfer classes will be managed on a custodial basis until transferred from federal jurisdiction. New public investments in these lands will generally be kept to a minimum.

THE PROPOSED MANAGEMENT PRESCRIPTION

This section identifies resource management objectives and required management actions. The resource management objectives set priorities for managing the various resources in the area. Required management actions identify the management actions, limitations, and other provisions that are needed to accomplish the objectives.

Lands

Management Objective

Retain a public land base of 453,731 acres for long-term management in federal ownership.

Required Management Actions

BLM would examine 4,495 acres of public land, applying the standard operating procedures for sales or for state or private exchanges. An additional 1,340 acres would be considered for transfer under the Desert Land Act. Detailed examination would be made before any lands were transferred under sale, exchange, or Desert Land Application. BLM would acquire 5,600 acres. (Refer to Map 3 in Appendix).

Minerals

Management Objective

Manage 475,595 acres of federal mineral estate for mineral and energy exploration and development while minimizing adverse impacts to other resource values.

Required Management Actions

A total of 161,909 acres would be open for oil and gas leasing with standard stipulations, 221,519 acres with seasonal occupancy restrictions, and 77,369 acres with no-surface-occupancy restrictions. Approximately 14,796 acres would be closed to oil and gas leasing. About 161,214 acres would be available for geothermal leasing with standard stipulations, 221,519 acres with seasonal occupancy restrictions, and 79,569 acres with no surface occupancy; 15,596 acres would be closed. A total of 160,848 acres would be open for solid mineral leasing with standard stipulations; 221,885 acres would be open with seasonal restrictions; and, 92,165 acres would be closed to solid mineral leasing. A total of 455,434 acres would be open for the location of mining claims, while 18,921 acres would be closed to mineral entry. An additional 540 acres would be open to location but subject to superior rights established by community pit and mineral material site designations. Mineral material (sand and gravel) disposals would be permitted on 382,888 acres; 92,010 acres would be closed.

Forest Management

Management Objective

Intensively manage 28,865 acres of available commercial forest land for the sustained yield production of timber (see Map 5). Manage 23,138 acres of woodland for the production of woodland products (firewood, Christmas trees, etc.).

Required Management Actions

Timber sales could occur on 28,865 acres. Of this, 1,179 acres would receive special management to protect crucial elk winter range. An additional 581 acres would receive special management to enhance the Continental Divide National Scenic Trail. Setting aside of 1,354 acres of commercial forest land would be made to protect Wilderness Values within the Eighteenmile Wilderness Study Area. Another 15 acres would be set aside to protect the Williams Lake Recreation Site. In order to maintain the visual qualities of the existing landscape along the Continental Divide Trail, 75 acres of commercial forest land would be set-aside. No timber harvesting would be scheduled in any of these set-aside stands.

Woodland product sales (firewood, Christmas trees, etc.) would occur on 23,183 acres. Within the Eighteenmile Wilderness Study Area, 2,509 acres would be closed to woodland product sales. In addition, 622 acres would be closed along the Continental Divide Trail.

Range Management

Management Objective

Manage 459,481 acres for grazing. Improve 595 acres of poor condition range to good and 21,876 acres of fair condition range to good. Provide 52,632 animal unit months (AUMs) of livestock forage in 20 years.

Required management Actions

In the long-term, reductions would be made on 46 allotments, increases would occur on 6, and 36 would remain unchanged. Grazing adjustments would be made over the 20-year life of the RMP and would occur only after conducting monitoring studies and coordinating with affected users. The initial stocking level of 43,602 AUMs would be below the active preference and the five-year average use. The long-term stocking level of 52,632 AUMs would be 18 percent below the active preference but only 2 percent below the five-year average use. Proposed improvements would include 22,700 acres of brush control, 4,400 acres of seedings, 32 springs, 50 miles of pipelines, 4 reservoirs, and 63 miles of fences. Selected allotment management plans (AMPs) would be designed to maintain or enhance forage for wintering elk herds (8,800 acres). Refer to Appendix B (Draft RMP/EIS) for specific allotment recommendations. (Refer to Table 5 for Allotment Summary, and Map 4 in Appendix).

These management actions will be accomplished in the steps outlined in the Implementation Section of this document.

Wildlife

Management Objective

Provide forage for 9,350 deer, 2,194 elk, 2,950 antelope, and 200 bighorn sheep. Improve 4,000 acres of elk winter/spring range; 17,000 acres of deer, antelope, and sage grouse seasonal ranges; and 22,000 acres of non-game habitat from fair to good ecological range condition to good. Improve 7,320 acres of seasonal elk and bighorn sheep ranges. Provide 40 acres of river habitat for waterfowl. Provide a more consistent water supply on 81,000 acres of antelope, sage grouse, and non-game habitat in the Gilmore and Muddy Creek area. Preserve habitat values of 30 small isolated seeps and wet meadows created by livestock water developments. Enhance big game movement and safety. Protect the future integrity of the elk breeding area in McDevitt Creek and antelope migration corridor near Center Ridge. Enhance the integrity and availability of 69,057 acres of crucial habitat of raptors, waterfowl, elk, and other wildlife. Improve the quality of 10,400 acres of crucial elk and bighorn habitat. Enhance bighorn sheep health protection in the Little Eightmile to Eighteenmile area.

Required Management Actions

BLM would reserve 6,466 AUMs of forage for big game. Table 4 of the Appendix illustrates big game forage demand for the Proposed Management Plan. Seven habitat management plans (HMPs) would be developed on about 299,000 acres.

Species	Location	Acreage
Elk/Deer	Haynes Cr. to Hayden Cr.	54,000
Elk/Deer	Kenney Cr. to Peterson Cr.	58,000
Elk/Bighorn	Little Eightmile to Eighteenmile	28,000
Antelope/Sage Grouse	Leadore to Blue Dome	120,000
Antelope/Sage Grouse	Upper Lemhi Valley	39,000
Nongame/Waterfowl	Morgan Bar	16
Nongame/Waterfowl	Tower Creek Flats	40

Prescribed burning would occur on 7,320 acres of big game range and 40 acres of river habitat. The BLM would install 18 guzzlers, construct six miles of pipeline, and fence numerous guzzlers (2 1/2 miles of fence). Roughly 3 to 4 miles of fence would be required on 30 small isolated seeps. About 154 miles of fence would be modified for big game movement and safety. The BLM would acquire 4,960 acres of state land and 640 acres of private land to protect critical habitat in the McDevitt Creek and Center Ridge areas. Crucial habitat would be enhanced through adoption of no-surface-occupancy restrictions on 69,057 acres available for mineral leasing. The quality of 8,800 acres of big game habitat would be improved through restrictions on livestock use and timber management and harvest. Bighorn sheep health protection would be improved by shifting all domestic sheep use to cattle use from Little Eightmile to Eighteenmile Creek.

Watershed Management

Management Objective

Manage 31 miles of stream to improve riparian habitat and water quality. Improve 500 acres of riparian area that are in unsatisfactory condition. Improve 1,494 acres of unsatisfactory condition watershed to satisfactory condition.

Required Management Actions

Four watershed activity plans would be written to help evaluate management options in different areas within the RMP area. New timber harvest roads would be closed when timber sales were completed except for use in forest and fire management. BLM would fence 15.5 miles of perennial stream riparian area.

Fisheries Habitat Management

Management Objective

Maintain 94.7 miles of stream in their present condition; improve 3.0 miles of McDevitt Creek from fair to excellent condition. Improve 2.5 miles of Sevenmile Creek, a tributary to the Salmon River.

Required Management Actions

Livestock grazing would be managed to maintain existing fishery habitat. Surface disturbing activities that would affect fisheries habitat would not be allowed. Stabilization projects would be considered in areas with unstable banks. Livestock would be excluded on 2.25 miles of Sevenmile Creek and 3.0 miles of McDevitt Creek and associated riparian areas by fencing. The current land ownership pattern would be retained.

Recreation Management

Management Objective

Recognize recreation as the principal use of the lands in the three special recreation management areas--the Salmon River, Continental Divide Trail, and Lewis and Clark Trail. Continue to manage for dispersed recreation by maintaining existing recreational opportunity settings. Manage the visual resources on lands outside of the special recreation management areas to maintain existing scenic qualities. Protect existing and planned investments in developed recreation sites.

Required Management Actions

The three special recreation management areas (SRMAs) would entail mineral withdrawals, restrictions on some nonrecreational uses, and restrictive visual management practices. A recreation area management plan (RAMP) would be written for each SRMA.

The Salmon River SRMA would include 4,405 acres. River access recreation sites would be constructed at Camp Creek and Elevenmile. The river would be managed as a "recreational" wild and scenic river, but Congressional direction for a formal Wild and Scenic River Study is not anticipated.

The Continental Divide National Scenic Trail SRMA would include 4,600 acres that would result from establishing a trail corridor one-quarter mile on either side of the proposed treadway. Visual resources within the corridor would be managed under Class II guidelines within a 200-foot-wide corridor along the treadway and under Class III guidelines within the remainder of the corridor. The set-aside of 75 acres of commercial forest land from the timber production base and all woodland product sales would be proposed. Restricted management activities on an additional 518 acres is proposed in order to maintain existing visual qualities. Restrictions may be imposed on the size of harvest units, siting of roads, slash disposal, and percentage of cover reduction.

The Lewis and Clark National Historic Trail SRMA would include 9,080 acres that would result from establishing a corridor wide enough to retain the natural aspects of the historic trail route. Visual resources within the corridor would be managed under Class II guidelines. Withdrawal of 1,820 acres from mineral entry would protect the trail route from disturbance. A no-surface-occupancy stipulation would also be added to all leases within these 1,820 acres.

Recreation Opportunity Spectrum: Recreation opportunities in the recreation opportunity spectrum (ROS) classes would remain similar to the existing situation. Lands would be managed in the primitive (.8 percent), semi-primitive nonmotorized (2.4 percent), semi-primitive motorized (4.2 percent), roaded natural (90.6 percent), and rural (2 percent) opportunity classes.

Off-Road Vehicle Use

Lands open to unrestricted vehicle use would total 428,540 acres (93 percent). Recreational off-road vehicle use would continue to be limited during winter months on 16,230 acres (6 percent of the RMP area) of big game winter range. A year-round closure to all vehicle use would be placed on 14,796 acres (3.5 percent of the RMP area) because of a wilderness designation.

Visual Resource Management

For visual resource management, the following designations would be made: Class I, 14,796 acres; Class II, 29,280 acres; Class III, 184,205 acres; and Class IV, 231,285 acres. No interim classes would remain.

Withdrawals

Existing and planned investments in developed recreation sites would be protected by withdrawal of 186.75 acres from mineral entry. However, revocation of existing withdrawals on 640.14 acres no longer required for recreation program management would be recommended. An additional 800

acres at Sharkey Hot Springs would be closed to geothermal leasing, subject to valid existing rights. Withdrawal of 15 acres of productive timber in the existing Williams Lake Campground would be necessary.

Wilderness

Management Objective

Recommend 14,796 acres of the Eighteenmile Wilderness Study Area as wilderness and the remaining 10,126 acres as nonwilderness.

Required Management Actions

Following designation by Congress, a wilderness management plan would be prepared for 14,796 acres of the Eighteenmile Wilderness Area. Approximately 1,354 acres of commercial forest land would be withdrawn from the timber production base. The 14,796 acres would be withdrawn from mineral entry and leasing as well as closed to all vehicle use.

Fire Management

Management Objectives

Manage fire for the protection and enhancement of resource values such as livestock forage, wildlife habitat, and timber. Reduce fire hazard potential on 10,000 acres.

Required Management Actions

Full suppression fire management guidelines would be followed on 444,770 acres. Under this alternative, 14,796 acres would be managed under the suppression restriction to maintain wilderness quality. All developed recreation sites and sites that have the potential for site development would be under suppression restrictions, i.e., no retardant, no heavy equipment use, and no fire line explosives. Prescribed burns for vegetation manipulation would be conducted on 30,078 acres. Heavy fuel loading caused by logging debris and dead trees would be reduced on 10,000 acres to decrease the likelihood of having a disastrous fire.

Cultural Resources

Management Objectives

Manage cultural resources so that representative samples of the full range of scientific and socio-cultural values are maintained consistent with state and federal laws.

Required Management Actions

Cultural resource management plans would be written and implemented for the Chief Tendoy Cemetery, the Salmon River corridor, the two Indian burial areas, and the Lewis and Clark Trail. These sites would be protected from surface disturbance through appropriate withdrawals and no-surface-occupancy restrictions:

	Cultural Area	Withdrawals	No Surface Occupancy
a.	Chief Tendoy Cemetery	80 acres	160 acres
b.	Lewis and Clark Trail	1,820 acres	1,820 acres
c.	Salmon River Corridor	120 acres	4,405 acres
d.	Indian Area A	120 acres	120 acres
e.	Indian Area B	120 acres	880 acres

Seven alternatives are analyzed in the Lemhi Resource Management Plan EIS (Part II of Draft). Each alternative emphasizes a different management philosophy, ranging from continuing present management to making significant changes in future management. Impact assessment of these alternatives has identified the magnitude of environmental consequences associated with each. A Proposed Plan has been selected based on the planning criteria previously described.

PLANNING CRITERIA

Planning criteria are the factors or data that BLM must consider prior to arriving at a land use decision relative to any issue. Listed below are the planning criteria and a discussion of how the ten general criteria have been applied in selection of the Proposed Plan.

1. Social and Economic Values

   The Proposed Plan considers social and economic values in Lemhi County by providing for land disposal, livestock grazing, mineral development, timber harvest and wildlife values. About 5,835 acres would be transferred from federal ownership. Livestock management would provide 43,602 AUMs of livestock forage. A total of 460,797 acres would be open for oil and gas leasing and 455,434 acres would be open for location of mining claims. Approximately 28,865 acres of public forest land would be open to commercial harvest, with an allowable cut of 1.07 million board feet per year.

2. Plans, Programs, and Policies of Other Federal Agencies, State and Local Governments, and Indian Tribes

   The BLM's resource management plans must be consistent with officially approved and adopted resource-related plans (or in their absence, policies or programs) of other federal agencies, state, and local governments, and Indian tribes. The Proposed Plan is consistent with the 1981 Lemhi County Comprehensive Plan. Public input from federal agencies, state and local governments, and Indian tribes does not indicate that there are any inconsistencies with their plans.

3. Existing Law, Regulations, and BLM Policy

   In the Proposed Plan, there does not appear to be any discrepancy with existing law, regulation, or BLM policy.

4. Future Needs and Demand for Existing or Potential Resource Commodities and Values

   The demand for minerals and energy is expected to remain low. The demand for the livestock grazing resource is high and there is a moderate demand for the timber resource. The Proposed Plan meets or exceeds these demands.

A lot of land is leased for mineral and energy development, but actual development is limited. Coal does occur in the Lemhi Resource Area but is of low quality; no coal mines have operated in the area for over 40 years. Leasing interest for geothermal resources is generally low. Phosphate rocks of low and medium grade do occur but development in the near future is unlikely.

The average use by livestock the past five years has been 52,541 AUMs. While the initial stocking rate would be 43,602 AUMS, the long-term stocking rate would increase to 52,632 AUMS.

Approximately 28,865 acres of public forest land would be open to commercial harvest, with an allowable cut of 1.07 million board feet per year.

5. Public Input

The Proposed Plan has taken into consideration the concerns of the minerals and energy industry by making lands accessible and available for exploration. Other public concerns have dealt with range resource, wildlife habitat, wilderness, lands disposal, and timber harvest. The Proposed Plan provides for the protection and use of all of these resources.

6. Public Welfare and Safety

Facilities provided at developed campgrounds and other recreational areas would provide for public welfare and safety. While public land within areas identified as open to motorized vehicle use generally would remain available for such use without restrictions, restrictions could be imposed when there was a need to promote user safety. To provide for public safety, stipulations would be included in mining plans of operations. Public hazards would be clearly marked and fenced, if necessary, to prevent injury. Full suppression fire management guidelines would be followed on 444,770 acres. In addition, heavy fuel loading caused by logging debris and dead trees would be reduced on 10,000 acres to decrease the likelihood of having a disastrous fire.

7. Past and Present Use of Public and Adjacent Lands

The Proposed Plan provides for the continuation of past and present use of public and adjacent lands while still providing for the protection and development of other resource values.

Livestock management would provide 43,602 AUMs of livestock forage in the short-term and 52,632 in the long-term. A total of 460,797 acres would be open for oil and gas leasing and 455,434 acres would be open for location of mining claims. Approximately 28,865 acres of public forest land would be open to commercial harvest, with an allowable cut of 1.07 million board feet per year. Game populations of 9,350 deer, 2,194 elk, 2,950 antelope, and 200 bighorn sheep

would utilize 6,466 AUMs of forage. For fisheries, BLM would maintain 94.7 miles of stream in their present condition and improve 3.0 miles. A total of 15.5 miles of perennial stream riparian area would be improved.

This plan would recognize recreation as the principal use of the lands in three special recreation management areas. Lands open to unrestricted vehicle use would total 428,540 acres.

8. Public Benefits of Providing Goods and Services in Relation to Costs

It is estimated that it would cost $1.7 million over the 20-year life of the RMP to provide goods and services. However, over a 20-year period, revenues of $10.8 million would be generated and state and local governments would receive $9.6 million.

9. Quantity and Quality of Noncommodity Resource Values

The Proposed Plan provides noncommodity resource values such as wildlife, fisheries, watershed, recreation, wilderness, and cultural sites. The quantity and quality of these resources would best be protected by alternative C. However, the Preferred Alternative would result in game populations of 9,350 deer, 2,194 elk, 2,950 antelope, and 200 bighorn sheep. For fisheries, BLM would maintain 94.7 miles of stream in their present condition and improve 3.0 miles. A total of 15.5 miles of perennial stream riparian area would be improved.

This plan would recognize recreation as the principal use of the lands in three special recreation management areas. Lands open to unrestricted vehicle use would total 428,540 acres. The Proposed Plan recommends 14,796 acres as suitable for wilderness designation. Five cultural resource management plans would be written.

10. Environmental Impacts

Transfer of lands out of federal ownership would result in a loss of administrative control of all resource values except mineral values. Designation of the Eighteenmile WSA as wilderness would result in the loss of harvestable timber yield from suitable commercial forest land in that area. Completion of nonstructural range improvements would represent a commitment of land and resources for the lives of the projects. Recreation opportunity spectrum classes that shifted from primitive and semi-primitive nonmotorized to semi-primitive motorized and roaded natural would likely never return to the original class.

On the positive side, the Proposed Plan would provide for improvement in ecological range condition. Livestock AUMs would show a minor increase over the 5-year average use. Wildlife habitat condition and available AUMs would increase. Fisheries habitat would show a moderate improvement. Improvements in riparian areas and watershed

can be expected. A major increase in recreational opportunities would take place. Wilderness acreage would be 14,796 acres. Impacts to cultural resources would decrease slightly.

Rationale

The Proposed Plan gives no special emphasis to any one resource but emphasizes balanced, multiple use management and is based upon a realistic expectation of funding. Alternative G would be the Proposed Plan if the Eighteenmile Wilderness Study Area is not designated by Congressional action. The rationale for selection of the Preferred Alternative is summarized below.

Outlined below is a discussion of how the Proposed Plan addresses the issues developed during the planning process.

LANDS - Retention and Transfer

Issue No. 1 deals with the disposal or retention of public lands. The Proposed Plan identifies a total of 5,835 acres to be evaluated through detailed studies for potential transfer out of public ownership. Of this total, 4,295 acres would be considered for transfer by public sales or exchanges; 1,340 acres through the Desert Land Act, and 200 acres by exchange only. Land acquisitions include the possibility of acquiring 1,240 acres of private and 4,360 acres of state land.

Rationale: The issue of disposal or retention of the public lands can best be handled by using a balanced land tenure adjustment program that improves management efficiency. The Proposed Plan would allow for a balanced sale, exchange, and Desert Land Entry program. This alternative maintains continuity in the grazing program and retains parcels that have high wildlife and other multiple use values. Only parcels of relatively low multiple use value that are difficult to manage or present management problems would be available for transfer.

The Proposed Plan would also recognize the expressed need to make land with agricultural potential available for development under the Desert Land Act. The lands specifically available for agricultural development would be transferred only if determined suitable as a result of the required detailed studies. Otherwise, they would be retained in federal ownership. This would assure continued multiple use management if the lands were not suitable for agricultural development.

Acquisitions would be aimed at benefitting the wildlife program (Issue No. 2b) by acquiring valuable wildlife habitat and migration corridors.

MINERALS

The Proposed Plan would maintain approximately 97 percent of the RMP area open to energy leasing, 81 percent open to solid mineral leasing and saleable mineral disposals, and 96 percent open to mineral location. All

of the RMP area is prospectively valuable for oil and gas. The occurrence of known solid leasable minerals is limited to a small area, approximately half of which would be closed. Mineral materials are widespread throughout the RMP area.

Approximately 18,921 acres would be withdrawn from mineral location by the recommendation for wilderness designation on a portion of the Eighteenmile WSA, for the protection of important historical and cultural resources, and for the protection of recreational developments. Roughly 92,596 acres would be closed to solid mineral leasing, but only 1,580 acres or 2 percent of this has any known potential for solid mineral leasing.

Rationale: The specific issues affecting minerals management are wildlife (Issue #5), wilderness (Issue #9), and recreation (Issue #7). In addition, minerals are affected by the management concern relating to cultural resources. The Energy and Minerals issue (#2) asks, "How will energy and mineral resource development be accommodated?" (2a); and "What lands would be closed to various mineral activities for the preservation of other resources?" (2b). These issues are addressed and answered in the RMP Proposed Plan as follows:

Wildlife (Issue #5): This issue is addressed by the seasonal closures for fluid mineral leasing and by some of the closures to solid mineral leasing and mineral material sales. Disruption of wildlife habitat by operations under the 1872 Mining Law can often be reduced or mitigated during the review process under the surface management regulations.

Wilderness (Issue #9): The issue is whether or not the Eighteenmile Wilderness Study Area (WSA) should be recommended for wilderness designation. Under this alternative, over half (roughly 60 percent) of the WSA would be recommended for wilderness designation. Designation of the area as wilderness would close it to mineral activity. Preliminary data (Geology, Energy, and Minerals Studies Phase 1 and Phase 2) indicate that potential for mineral development of this area is low. There are no known mineral occurrences within the WSA, and there are no mining claims located within the WSA. The Phase 2 study conducted by the U.S. Geological Survey is not conclusive as to the possibility of mineral occurrences within the area, since some of their geochemical data may indicate potential for metallic minerals. However, the lack of reported occurrences and mining claims is a good indicator that the industry may consider the area to have low potential. Therefore, the withdrawal of this area from all forms of mineral activity is thought to have no significant impact on national mineral production.

Recreation (Issue #7): The first recreation issue (#7a), overcrowding of facilities, would hardly affect mineral production. Developed recreational areas would be withdrawn from the operations of the mining law, closed to mineral material sales and non-energy mineral leasing, and leased for fluid minerals only with the no-surface-occupancy stipulations. None of the existing recreation sites, or future proposed sites, are in areas with known mineral potential, so any impact would be small if areas were closed or withdrawn.

The second recreation issue (#7b) is, "What management practices should occur within areas of national significance?" This issue is answered by the use of no surface occupancy for fluid mineral leasing and the closure of some areas to material sales and solid mineral leasing in the Proposed Plan. Activity under the 1872 Mining Law can be adequately managed under the surface management regulations during the Plan of Operations review process. In general, the primary restrictions on minerals would be placed on the Lewis and Clark Trail area, the Salmon River corridor, and the Continental Divide Trail. Of these areas, only the Continental Divide Trail has a significant known mineral deposit (primarily thorium), and the trail would not be withdrawn from location under the Proposed Plan.

Cultural Resources (Management Concern #2): Under the Proposed Plan, this management concern would be answered by the use of the no-surface-occupancy stipulation for fluid mineral leasing, closure to solid mineral leasing and mineral material sales, and, where necessary, withdrawal from the operation of the 1872 Mining Law. In general, closures would be small and would have little, if any, impact on local or nationally significant mineral values.

FOREST MANAGEMENT

Under the Proposed Plan, over 95 percent of the suitable commercial forest land would be available for intensive forest management (see Map 5). The set-aside acreage under this alternative would amount to 90 acres for protection of recreation values and 1,354 acres for protection of recommended wilderness.

Of the 95 percent available for intensive management, approximately 6 percent would be restricted for protection of high value resources. Specifically, 1,179 acres would be restricted to reduce the impacts to crucial elk winter range and 581 acres to maintain the visual qualities of the existing landscape along the Continental Divide National Scenic Trail.

Approximately 88 percent of the woodland within the planning area would be open to woodland product sales (firewood, Christmas trees, etc.). The remaining 12 percent would be closed to protect 622 acres having high recreation values and 2,509 acres encompassing recommended wilderness.

Intensive management of the 28,865 acres of available commercial forest land would enable the planning area to support its present sustained yield allowable cut of approximately 10.71 million board feet per decade.

Rationale: The Proposed Plan recognizes the local demand for timber while accommodating other high value resources requiring protection from the impacts of timber harvesting. This alternative designates the commercial forest lands available for intensive management (Issue 3a) and provides for the planning area to meet its present sustained yield allowable cut. The alternative further delineates areas of restricted management in response to important recreation, watershed, and wildlife values (Issue 3b).

Protection of certain high value resources includes the set-aside of 1,444 acres necessitated by the importance of maintaining the visual quality within the proposed Eighteenmile Wilderness Study Area, Continental Divide National Scenic Trail, and the Williams Creek Recreation Site. Less restrictive measures allowing the harvest of timber were found to be inadequate in the proposed management of these resources under this alternative. All of the proposed set-asides in this plan are in conformance with current BLM forest land policy.

Selection of this plan provides an even supply of timber to local markets, yet mitigates the impacts of timber harvesting on other important resource values. Designations of set-asides and restrictions are consistent with current BLM forest land policy; they eliminate major impacts to conflicting resources while having negligible economic impact to the local community.

RANGE MANAGEMENT

The Proposed Plan is based on 459,481 acres of public land in 88 grazing allotments with the short-term grazing preference reduced from 63,898 AUMs to 43,602 AUMs. If 5,182 acres of public land are transferred to private ownership, this would leave 454,299 acres in 82 allotments with a short-term grazing preference of 42,842 AUMs. The long-term stocking level would be between 51,872 AUMs and 52,632 AUMs depending on the acres transferred.

The Proposed Plan recognizes the need to improve watershed condition, riparian areas, and livestock distribution while providing forage and habitat for wildlife and initiating a brush control program. Seeding would be done in areas where a native perennial seed source was not available. Additional range improvements--spring developments, pipelines, reservoirs, and fences--would also be provided.

Rationale: The Proposed Plan recognizes livestock grazing on public land as the third most important economic resource for this area. It maintains most of the current livestock operations with the exception of those allotments which would be transferred to private ownership through lands actions. The Proposed Plan would provide for multiple use by allowing livestock grazing, soil protection, wildlife habitat, and other resource uses. It addresses the major range management problems of repetitive early grazing of spring range and over-utilization of riparian zones and meadows, both wet and dry. It also provides the parameters for controlling the spread of noxious plants. It identifies small allotments which could be combined with other adjoining small allotments to improve management flexibility and opportunities.

Range improvements, designed to improve livestock distribution, would enhance or have minimal adverse impacts on the other resources.

There would not be significant long-term grazing reductions while increasing good ecological condition range from 61 to 66 percent of the planning area.

The Proposed Plan would address three issues: (4.a) managing the range resource to meet existing and future livestock demand, (4.b) designating forage for livestock and wildlife uses, and (4.c) using special management techniques for livestock grazing to improve sensitive areas.

WILDLIFE

The Proposed Plan would provide for existing big game populations and Idaho Department of Fish and Game population projections through 1995. It would provide for improvement of crucial elk winter range; deer, antelope and sage grouse habitat; and nongame habitat. Habitat would be protected or enhanced through acquisition of limited acreages of state and private land; moderate restrictions on livestock use, forestry, and mineral activity; and retention of all important habitat. Fences presenting a hazard or movement problem for big game would be modified. Guzzlers would be installed for antelope, sage grouse, and nongame in water deficient areas. Sensitive and threatened or endangered species habitats would be protected through standard operating procedures. This alternative should provide enhanced habitat conditions such that population increases for many wildlife species would be possible.

Rationale: The Proposed Plan formally recognizes the ecologic nonconsumptive and consumptive values associated with viable populations of diverse species of wildlife and their habitat. Supporting that recognition are accommodations for wildlife by other, potentially competing, resource activities and various habitat improvement efforts. The Proposed Plan should provide the enhanced habitat conditions that would make possible population increases for many wildlife species.

The Proposed Plan addresses the issues of livestock and wildlife forage designations (4.b), wildlife habitat management (5.a,b,c), restrictions on forestry to protect wildlife habitat (3.b), and restrictions on mineral activities to protect wildlife habitat (2.b).

WATERSHED

Under the Proposed Plan, 1,494 acres of watershed presently in unsatisfactory condition would be improved through monitoring and livestock grazing use modifications. Approximately 15.5 miles of perennial stream riparian area would be improved by fencing to exclude livestock. Thirteen of fourteen riparian areas listed in Table 3-5 page 3-20 of the Draft RMP/EIS as "most in need of improvement" will improve under this proposed plan. Timber harvest roads would be closed except for forestry and fire management purposes following completion of timber harvest activities to mitigate the adverse impacts of timber harvesting on watersheds and water quality.

Rationale: The Proposed Plan recognizes that water and water-related resources in the area are of great importance to both public and private lands. Mitigation efforts for water and watershed resources would support this recognition. The Proposed Plan should maintain or improve

riparian and watershed conditions such that benefits associated with healthy riparian areas and watersheds (improved wildlife, fisheries, recreation, water quality, and flood control) could be maintained or improved.

The Proposed Plan addresses the issues of riparian degradation due to overuse by livestock (6.a), watershed degradation caused by timber harvest practices (6.b), and overgrazing by livestock on highly erosive, low elevation rangeland (6.c). The proposed plan recognizes the direct and indirect values associated with healthy riparian areas. The political, socioeconomic, and ecological complexities surrounding the riparian problems are enormous. Refer to Appendix A-8 for detailed rationale concerning riparian management.

FISHERIES HABITAT MANAGEMENT

The Proposed Plan would improve fisheries habitat on 3.0 miles of McDevitt Creek and improve water quality on 2.25 miles of Sevenmile Creek. A total of 94.7 miles of stream would be managed to maintain fisheries habitat in its present condition.

Rationale: The Proposed Plan recognizes the importance of the aquatic/riparian habitat along 5.5 miles of perennial stream that would be improved. The other 94.7 miles would remain in an overall static trend. This addresses planning issues (6.a) and (4.c).

SOILS

Issue 6.c asks, "How should the problem of early spring turnout and overgrazing by livestock on highly erosive, low elevation rangeland be handled?"

Rationale: The Proposed Plan would establish lower stocking rates, implement more range improvements, and improve livestock distribution. The improved distribution would lead to improvement of the poor and fair ranges (20,200 acres), thus reducing the erosion potential on these areas. The better distribution would lessen, but not eliminate, the impact of grazing and wildlife on the bentonite badlands areas (5,028 acres).

RECREATION

Recreation use varies in direct proportion to the national economy, river water levels, big game seasons, and anadromous fish runs. Principal uses include hunting, fishing, off-road vehicle (ORV) use, river running, and sightseeing. The Proposed Plan would continue the designation of three special recreation management areas: the Salmon River, Continental Divide Trail, and Lewis and Clark Trail. Recreation sites would be developed at two locations. Mineral entry withdrawals, no-surface-occupancy restrictions, and other use restrictions would be used in developed recreation

sites and special recreation management areas. The Proposed Plan would leave 93 percent of the area open to ORV use. There would be 14,796 acres closed to ORV use, and 16,230 acres would have a seasonal (winter) use limit.

Rationale: The development and protection of recreation sites and nationally designated trails would help meet the projected demand for recreation in the area. There has been an increasing demand for recreation opportunities along the Salmon River. The special recreation management area designations would provide for more detailed planning so that most uses could be accommodated. The closure of 14,796 acres to ORV use is required for the area recommended for wilderness (if designated by Congress).

This plan designates open, limited, and closed ORV areas in response to Issue #8 and provides specific management direction for existing recreational facilities and nationally significant areas in response to Issue #7.

WILDERNESS

Within the Eighteenmile Wilderness Study Area (WSA), 14,796 acres would be recommended for wilderness designation and 10,126 acres for nonwilderness uses under the Proposed Plan.

Rationale: The area recommended for wilderness designation contains the heart of the WSA, including all of the primitive and most of the semi-primitive nonmotorized lands. This area is manageable as wilderness, little influenced by past land uses, and borders a portion of the Italian Peaks Roadless Area recommended for wilderness by the U.S. Forest Service.

The area recommended for nonwilderness is a narrow strip adjacent to several mining areas that has been more affected by nearby past uses than the rest of the WSA. Management of this narrow strip of land as wilderness would be difficult. Adjacent Forest Service lands are not recommended for wilderness designation.

This plan offers a reasonable response to the issue of wilderness suitability (Issue #9).

FIRE MANAGEMENT

The Proposed Plan would provide for full suppression on 444,770 acres and limited suppression only on isolated tracts. A total of 14,796 acres would be managed under the suppression restrictions within the WSA. A hazard reduction program would be conducted on 10,000 acres. Prescribed fires would be used to treat 30,078 acres to improve forage and wildlife habitat.

Rationale: Prescribed fire is an economical means of carrying out brush control and other vegetative manipulation projects. The WSA has certain criteria that state what type of suppression actions can be taken in that area. Hazard reduction is a means of removing fuel loading in areas that have the potential, if a fire starts, to support a disastrous fire.

CULTURAL RESOURCES

The Proposed Plan would protect and preserve documented prehistoric and historic sites. Cultural resource management plans would be prepared for five areas, including the Chief Tendoy Cemetery, the Salmon River, the Lewis and Clark Trail, and Indian Area A and Indian Area B. Management plans would guide the use and protection of significant cultural, natural history, and paleontological resources under BLM administration. The cultural resources standard operating procedures would be applied to protect cultural resources.

Rationale: The Lemhi Resource Area's cultural resources are fragile, nonrenewable resources. They have significant socio-cultural values as well as excellent archaeological research potential. The Proposed Plan recognizes the nature and significance of these resources and would recommend protective and interpretive measures. The Bureau is required by law to protect the cultural resources on the public lands. Cultural resource protection and use would remain consistent and compatible with other public land resource uses and activities. The standard operating procedures would help protect cultural resources throughout the planning area. This alternative addresses management concern #2, which was identified during the scoping process.

STANDARD OPERATING PROCEDURES

The following management guidance applies to, and is a part of, the Proposed Management Prescription. All Standard Operating Procedures (SOPs) are based on existing laws, regulations, and policy.

Allowable Uses

The public lands will be managed under the principles of multiple use and sustained yield as required by the Federal Land Policy and Management Act (FLPMA). Any valid use, occupancy, or development of the public lands that conforms with the RMP will be considered. Those uses, including rights-of-way, leases, and permits, will be subject to environmental review and may require limitations or stipulations to protect and preserve natural resources. Limitations may also be imposed on either the type or intensity of use, or both, because of environmental values, hazards, or special management considerations. Some limitations have already been identified for specific areas. These are included in the land use allocations and management objectives in this land use plan.

Coordination With Other Agencies, State and Local Governments, and Indian Tribes

The BLM will ensure that the detailed management plans and individual projects resulting from the RMP are consistent with officially adopted and approved plans, policies, and programs of other agencies, state and local governments, and Indian Tribes. Cooperative agreements and memoranda of understanding will be developed as needed to promote close cooperation between BLM and other federal agencies, state and local governments, and Indian Tribes.

Lands

Land Ownership Adjustments

Objectives for acquiring public lands are discussed under activity needs within the alternatives. Site-specific decisions regarding land ownership adjustments in the resource area will be made based on whether the lands are needed for Bureau programs or are considered more valuable for other purposes. The following criteria will be applied to site-specific determinations for lands that are within transfer areas:

1. Public resource values, including but not limited to:

    a. Threatened, endangered, or sensitive species habitat.
    b. Riparian areas.
    c. Fisheries.
    d. Nesting/breeding habitat for game animals.
    e. Key big game seasonal habitat.
    f. Developed recreation and recreation access sites.
    g. Class A scenery.
    h. Municipal watersheds.
    i. Energy and mineral potential.
    j. Sites or places eligible for inclusion on the National Register of Historic Places.
    k. Wilderness areas and areas being studied for wilderness.
    l. Other designations authorized by law.

2. Accessibility of the land for public uses.

3. Amount of public investment in facilities or improvements and the potential for recovering that investment.

4. Difficulty or cost of administration (manageability).

5. Suitability of the land for management by another federal agency.

6. Significance of the decision in stabilizing business, social, and economic conditions and/or lifestyles.

7. Encumbrances, including, but not limited to, Recreation and Public Purposes leases, withdrawals, and other leases or permits.

8. Consistency of the decision with cooperative agreements and plans or policies of other agencies.

9. Suitability, and need for change in land ownership or use, for purposes including, but not limited to, community expansion or economic development such as industrial, residential, or agricultural (other than grazing) development.

The land ownership adjustment criteria identified above will be considered in land reports and environmental analyses prepared for specific adjustment proposals.

Retention Areas

Public land within retention areas generally will remain in public ownership and be managed by the BLM. Transfers to other public agencies will be considered where improved management efficiency would result. Recreation and Public Purpose applications will be considered on all public lands except those lands of national significance. Land exchange proposals will be considered on all public lands. However, these proposals must be in the public interest, which will be determined by site-specific application of the land ownership adjustment criteria.

Transfer Areas

Public land within transfer areas generally will be made available for disposal through sales, exchanges, or desert land entry. Some land may be retained in public ownership based on site-specific application of the land ownership adjustment criteria.

Exchanges

Land to be acquired by BLM through exchanges generally should be located in the retention areas. In addition, acquisition of such land should:

1. Facilitate access to public lands and resources.

2. Maintain or enhance important public values and uses.

3. Maintain or enhance local social and economic values.

4. Improve management efficiency through the elimination of isolated tracts and the blocking up of public lands.

5. Facilitate implementation of other aspects of the Lemhi RMP.

Sales

Public land to be sold must meet one or more of the following criteria derived from Section 203(a) of the Federal Land Policy and Management Act of 1976:

1. The land must be difficult and uneconomic to manage as part of the public lands and must not be suitable for management by another federal department or agency.

2. The land must have been acquired for a specific purpose and must no longer be required for that or any other federal purpose.

3. Disposal of the land will serve important public objectives that can be achieved prudently or feasibly only if the land is removed from public ownership, and these objectives outweigh other public objectives and values that would be served by maintaining the land in federal ownership.

Sale will be the preferred method of disposal when:

1. It is required by national policy.

2. The level of interest in a specific tract indicates that competitive bidding is desirable for reasons of fairness.

3. Disposal through exchange is not feasible.

Agricultural Development

Public land identified for agricultural development must meet all of the following criteria:

1. Each 40-acre parcel in an application must contain at least 40 percent of Soil Conservation Service capability Class I, II, or III soils.

2. The land must be lower than 6,350 feet in elevation.

3. The land must meet the requirements of the Desert Land Act of March 3, 1877, as amended.

Unauthorized Use

It is BLM policy to identify, abate, and prevent unauthorized use of public lands. Existing unauthorized uses of public land will be resolved either through termination, temporary authorization by short-term permit, issuance of rights-of-way, leasing through the Recreation and Public Purposes Act, sale, exchange, or other appropriate manner.

Utility/Rights-of-Way (ROW) Avoidance

Utility and transportation development may be permitted based on consideration of the following criteria:

1. Type of and need for the proposed facility.

2. Conflicts with other existing or potential resource values and uses.

3. Availability of alternatives and/or mitigation measures.

Land Use Authorizations

Land use permits under Section 302 of the Federal Land Policy and Management Act may be used as an interim management measure for resolving unauthorized use problems prior to a final land use/status determination, and for one-time uses of short duration. Leases will be used as a longer-term (5 to 10 years) interim management tool, particularly where future disposal or dedication to another particular land use is contemplated. The latter may allow for agricultural use on an area that may also be needed for future materials sources, or for community expansion needs.

Cooperative agreements, under certain circumstances, may be reached with other federal entities for uses that are not appropriately covered by a right-of-way or a withdrawal. Flood control and aquifer recharge areas may be most appropriately covered by cooperative agreements.

Withdrawals and Classifications

It is BLM policy to review all withdrawals on and classifications of public lands by October 20, 1991. This includes a review of approximately 6,180 acres of various withdrawals as well as review of the Classification and Multiple Use Act (I-1639) that will involve approximately 422,578 acres of public land. Review of these latter acres is to be complete by the end of September 1987.

The multiple use classification will be reviewed through the planning process and a decision will be made to cancel or continue the classification, either in whole or in part, based on the transfer and retention areas.

Access

All existing public access routes will be reserved if the lands are transferred out of public ownership. Easements will be obtained across private property as needed for general public use and public land management by BLM.

Energy and Minerals

Oil and Gas Leasing

Oil and gas leasing is presently covered by a district-wide environmental assessment, which is incorporated in this RMP.

As a general rule, public lands within the resource area are available for oil and gas leasing. In many areas, oil and gas leases will be issued with only the standard stipulations. In other areas, leases will have special stipulations attached to them at the time of issuance to protect seasonal wildlife habitat or other sensitive resource values. In highly

sensitive areas, where special stipulations do not provide adequate protection for important surface resource values, portions of the lease, or the entire lease, will be issued with a "no-surface-occupancy" stipulation.

This analysis assumes that horizontal deviations of up to 1,500 feet are feasible with current directional drilling techniques. However, because of the high cost of directional drilling, such operations would not be anticipated unless there is high potential for a discovery.

The general areas where standard, special, and "no-surface-occupancy" stipulations would apply are shown on the map. During any given year, the authorized officer could waive the special restrictions if actual conditions did not warrant them. The standard stipulations are as follows:

Endangered, Threatened, or Sensitive Species: The Federal Surface Management Agency is responsible for assuring that the leased land is examined prior to undertaking any surface-disturbing activities to determine effects upon any plant or animal species, listed or proposed for listing as endangered or threatened, or their habitats. The findings of this examination may result in some restrictions to the operator's plans or even disallow use and occupancy that would be in violation of the Endangered Species Act of 1973 by detrimentally affecting endangered or threatened species of their habitats.

The lessee/operator may, unless notified by the authorized officer of the Surface Management Agency that the examination is not necessary, conduct the examination on the leased lands at his discretion and cost. This examination must be done by or under the supervision of a qualified resources specialist approved by the Surface Management Agency. An acceptable report must be provided to the Surface Management Agency identifying the anticipated effects of a proposed action on endangered or threatened species or their habitats.

Erosion Control: Surface disturbing activities may be prohibited during muddy and/or wet soil period. This limitation does not apply to operation and maintenance of producing wells using authorized roads.

Controlled or Limited Surface Use Stipulation: This stipulation may be modified by special stipulations which are hereto attached or when specifically approved in writing by the District Manager, Bureau of Land Management, with concurrence of the Federal surface management agency. Distances and/or time periods may be made less restrictive depending on the actual on-ground conditions. The lessee should contact the Federal Surface Management Agency for more specific locations and information regarding the restrictive nature of this stipulation.

The lessee operator is given notice that the lands within this lease may include special areas and that such areas may contain special values, may be needed for special purposes, or may require special attention to prevent damage to surface and/or other resources. Possible special areas are identified below (would be listed below on an actual lease). Any

surface use or occupancy within such special areas will be strictly controlled or, if absolutely necessary, excluded. Use or occupancy will be restricted only when the Bureau of Land Management and/or the Surface Management Agency demonstrates the restriction necessary for the protection of such special areas and existing or planned uses. Appropriate modifications to imposed restrictions will be made for the maintenance and operations of producing oil and gas wells.

Geothermal Leasing

Geothermal resource leasing is covered by a district-wide environmental assessment at the present time, and this assessment is incorporated in the RMP. Lease applications will continue to be processed as received. Stipulations developed during the preparation of the district-wide environmental assessment will be attached to the leases prior to issuance. Specific proposals for prelease exploration or operation on leases will be reviewed by an interdisciplinary team. This review process will result in a site-specific environmental assessment of the proposal and may include additional special stipulations necessary to protect other resources. Seasonal or no-surface-occupancy stipulations for oil and gas leasing apply also to geothermal leasing in the same specified areas.

Non-Energy Mineral Leasing

Prospecting permits and lease applications will be reviewed by an interdisciplinary team and environmental assessments will be prepared for each proposed action. These assessments will develop any special stipulations necessary for the protection of other surface resources. A phased approach will be used, with site-specific analysis of a proposed activity following the analysis completed for permit issuance. The only known potential for hardrock leasing is in the Hawley Creek area; an environmental assessment has been completed for Hawley Creek, with a recommendation for issuance of prospecting permits.

Coal Leasing

In this RMP, coal leasing is not considered as an issue because the potential for commercial development appears very low. Applications for coal prospecting permits or coal leases will be evaluated when received. Preliminary applications of the "Coal Suitability Criteria" indicate that not all lands identified as having coal potential are suitable for leasing.

Locatable Minerals

Mineral exploration and development on public land will be regulated under 43 CFR 3800 to prevent unnecessary and undue degradation of the land. The BLM will conduct validity examinations, checking mining claims to determine whether a claimant has established any right to the mineral resources, under the following conditions:

1. Where a mineral patent application has been filed and a field examination is required to verify the validity of the claim(s).

2. Where there is a conflict with a disposal application and it is deemed in the public interest to do so, or where the statute authorizing the disposal requires the removal of mining claims that are not valid. If the validity examination showed that the mining claim was valid, the disposal action could not be completed.

3. Where the land is needed for a federal program.

4. Where a mining claim is located under the guise of the mining law and flagrant unauthorized use of the land or mineral resource is occurring.

Withdrawals from mineral entry will be used only where there are significant resource values that cannot be adequately protected under the surface management regulations. This would include areas recommended for wilderness designation, important historical and cultural resources, and recreational developments.

Public land will be reopened to mineral entry where mineral withdrawals are revoked through the withdrawal review process.

Salable Minerals (Common Variety)

Applications for the removal of common variety mineral materials will be processed using the standards developed in this RMP and the restrictions developed for each alternative. Since most disposals within the resource area are generally under the 100,000 ton or cubic yard threshold, the Categorical Exclusion Review process for critical resources will be used; an environmental assessment need not be prepared. Community pits will be designated where there is sufficient demand to open new material sites. Disposals to state, county, and municipal governments will generally be handled through issuance of free use permits rather than establishment of mineral material sites.

Forest Management

General Forest Management and Planning

The suitable timber production base, as determined by the Timber Production Capability Classification inventory, will be subject to the specific restrictions and withdrawals required by this RMP. These RMP actions further refine the timber base to those acres available for sustained yield production of forest products. All lands within the available timber production base will be considered for scheduled timber harvesting and subject to a variety of forest development activities.

Restrictions placed on the available timber base because of concerns for other resource values (wildlife, recreational use, etc.) will not rule out intensive forest management and planned timber harvest. However, any loss in timber yield resulting from these restrictions will be taken into consideration in future allowable cut computations.

Any commercial forest lands set aside are removed from the timber production base will not be available for scheduled timber harvesting. This acreage will not be included in allowable cut calculations. However, these set aside stands, along with those classified as woodland, will be subject to limited forest management activities such as logging road right-of-ways, salvage operations, and firewood cutting. Any volumes of timber removed from these lands will not be used to satisfy allowable cut levels.

Timber Harvesting and Silvicultural Treatments

Methods of harvest will include clearcutting and shelterwood systems. Clearcutting will be utilized in predominantly lodgepole pine stands, with limited use in Douglas-fir to control dwarf mistletoe infestations. Clearcuts will be limited to 40 acres and will be irregularly shaped to minimize wildlife escape distances and blend into the surrounding landscape.

Timber marking prescriptions will concentrate on genetic improvement of the regenerated stand and will be designed primarily to encourage natural regeneration.

Natural regeneration will be the primary method of reforestation except where an area has been depleted or heavily affected by insects, disease, fire, or other natural catastrophe. Artificial reforestation or site preparation will be considered when natural regeneration does not occur within five years after harvest. The backlog of harvest areas without adequate regeneration stocking levels will also be planted or scarified as forest development funds become available.

Tractor skidding will be restricted to slopes of 45 percent or less in the volcanic, granitic, and sediment land types. Skidding on quartzite soils will be allowed on slopes up to 60 percent. One exception to the 45 percent restriction would be on small areas of convex slopes with inadequate deflection for cable yarding. Some limited skidding activity on slopes up to 60 percent would be allowed in these areas.

Slash treatments will vary with the specific harvesting system and the silvicultural objectives for the stand. Most Douglas-fir harvest units will require lop and scatter slash disposal with some piling of large concentrations at landings. Lodgepole pine slash treatments will vary between lop and scatter and piling depending on cone serotiny and stand objectives. All burning of slash will be conducted by BLM personnel in conformance with state air quality guidelines.

All skid trails will be cross-drained with the construction of water bars upon completion of skidding operations.

All harvest units susceptible to livestock damage will be protected by grazing closures or fencing until such time as regeneration becomes stocked and established.

At least three nonhazardous snags per acre will be left in shelterwood harvest units for nongame wildlife use. In the absence of sufficient numbers of nonhazardous snags, some large culls will be substituted.

Seasonal harvest restrictions and road closures will be imposed to protect soils, watershed, and wildlife values during critical periods.

No firewood cutting permits will be issued in cottonwood/aspen and associated riparian areas/drainages except as part of a special vegetation management project designed to encourage sprouting and regeneration of the stand.

All forestry practices will meet or exceed those set forth under the Idaho Forest Practices Act, Title 38, Chapter 13, Idaho Code.

Range

Allotment Categorization

All grazing allotments in the resource area have been assigned to one of three management categories--M (maintain), I (improve), and C (custodial)--based on present resource conditions, potential for improvement, and management objectives. The M category allotments generally will be managed to maintain current satisfactory resource conditions, I category allotments generally will be managed to improve resource conditions, and C category allotments will receive custodial management while protecting existing resource values.

Allotment-Specific Objectives for the Improvement Category

Multiple use management objectives have been developed for each allotment in the I category (see Appendix B, Draft Lemhi RMP/EIS). Future management actions, including approval of allotment management plans, will be tailored to meet these objectives. However, the priorities assigned to achieving sometimes conflicting objectives for wildlife habitat, watershed, vegetation condition, and livestock forage production differ between alternatives.

Implementing Changes in Allotment Management

Activity plans are commonly used to present, in detail, the types of changes required in an allotment and to establish a schedule for implementation. Actions set forth under the AMP that affect the environment will be analyzed and compared to alternative actions. During the analysis, the proposal may be altered or completely revamped to mitigate adverse impacts. The following sections contain discussions of the types of change likely to be recommended in an activity plan and the guidance that applies to these administrative actions.

Livestock Use Adjustments

Livestock use adjustments are made by changing one or more of the following: the season of use, the number of head, or the pattern of grazing. For each of the alternatives presented in this RMP, target stocking rates have been set for each allotment (refer to Appendix B, Draft Lemhi RMP/EIS). While most livestock use adjustments will occur in the I allotments, use adjustments are permitted for allotments in categories C and M.

In reviewing the target stocking rate figures and other recommended changes, it is emphasized that the target animal unit month (AUM) figures are not final stocking rates. All livestock use adjustments will be implemented through documented mutual agreement or by decision. When adjustments are made through mutual agreement, they may be implemented once the Rangeland Program Summary has been through a public review period. When livestock use adjustments are implemented by decision, the decision will be based on operator consultation, range survey data, and monitoring of resource conditions. Current BLM policy emphasizes the use of a systematic monitoring program over a period of years to verify the need for livestock adjustments proposed on the basis of one-time inventory data.

Monitoring will also be used to measure the changes brought about by new livestock management practices and to evaluate the effectiveness of management changes in meeting stated objectives. Detailed guidance for rangeland monitoring is available in current BLM policy and guidance. (Refer to Implementation Section of this document).

The federal regulations that govern changes in allocation of livestock forage provide specific direction for livestock use adjustments implemented by decision. The regulations specify that permanent increases in livestock forage or suspensions of preference "shall be implemented over a five-year period...." The regulations do provide for adjustments to be implemented in less than five years when (1) an agreement is reached to implement the adjustment in less than five years or (2) a shorter implementation period is needed to sustain resource productivity.

Temporary Suspensions and Closures

Temporary suspensions of grazing use or closures of all or portions of allotments may be implemented to protect the public lands because of drought, fire, flood, or insect infestation. When conditions such as fire, flood, or insect infestation create a significant impact on the normal operation of a grazing operator, efforts to mitigate the impact will be taken by BLM. These mitigating efforts may consist of relocation of grazing use, modification of grazing systems, and granting of temporary nonrenewable grazing use in other allotments under permit or lease. No action will be taken by BLM prior to consultation and coordination with affected permittees or lessees and other affected parties.

Range Improvements and Treatments

Typical range improvements and treatments and the general procedures to be followed in implementing them are described in Appendix B, Draft Lemhi RMP/EIS. The extent, location, and timing of such actions will be based on the allotment-specific management objectives adopted through the resource management planning process, interdisciplinary development and review (to include the Idaho Department of Fish and Game) of proposed actions, operator contributions, and BLM funding capability. Since some of the soils in the resource area may be unsuitable for range improvement projects, proposed projects will be investigated for feasibility prior to approving location and design plans.

All new fence construction will comply with the Lemhi Resource Area fencing policy dated May 20, 1983 which is as follows:

It shall be standard policy for the Lemhi Resource Area that:

A. All wire fences constructed subsequent to this policy statement shall be 3-wire only.

B. Wire spacing shall be as follows:

   a. Top wire shall be set no higher than 38" from ground level.
   b. Bottom wire shall be smooth and set at a minimum of 18" from ground level.
   c. Mid-wire shall be set at 26" from ground level unless:
      1. Bighorn sheep are involved (34")
      2. Fence is adjustable for antelope (29")

C. All new fences shall be flagged (e.g. cloth strips, survey flagging) between every other post.

D. Exceptions: Variances or exceptions to the above may be allowed in unusual or unique circumstances where public safety is in- volved or where total exclusion of animals is required (e.g. campgrounds, exclosures, etc.). Exceptions will be justified in writing.

All allotments in which range improvement funds are to be spent will be subjected to an economic analysis. The analysis will be used to develop a final priority ranking of allotments for spending range improvement funds that are needed to carry out activity plans. The highest priority for implementation generally will be assigned to those improvements for which the total anticipated benefits exceed costs. Generally, all structural range improvements will be maintained by the benefitting party(s). All nonstructural range improvements will be maintained by BLM.

Noxious weed control will be considered under all alternatives. Individual sites and species (i.e., larkspur, Canadian thistle, leafy etc.) will be handled on a case-by-case basis through the environmental assessment (EA) process. Where biological controls have proven to be effective, they will be used in preference to chemical or mechanical methods.

Grazing Systems

The type of system to be implemented will be based on consideration of the following factors:

1. Allotment-specific management objectives (see Appendix B, Draft Lemhi RMP/EIS)

2. Resource characteristics, including vegetation potential and water availability

3. Operator needs

4. Implementation costs

Typical grazing systems available for consideration are described in Appendix B of the Draft Lemhi RMP/EIS.

Unleased or Unpermitted Tracts

Unleased or unpermitted tracts generally will remain available for further consideration for authorized grazing, as provided for in the current BLM grazing regulations. However, certain tracts currently closed or restricted to grazing use will remain so.

Wildlife and Fisheries Program

General

Fish and wildlife habitat will continue to be evaluated on a case-by-case basis as a part of project-level planning. Such evaluation will consider the significance of the proposed project and the sensitivity of fish and wildlife habitat in the affected area. Stipulations will be attached as appropriate to assure compatibility of projects with management objectives for fish and wildlife habitat. Habitat improvement projects will be implemented where necessary to stabilize or improve unsatisfactory or declining wildlife habitat condition. Such projects will be identified through habitat management plans or multiple resource management activity plans.

Seasonal Restrictions

Seasonal restrictions will continue to be applied where they are needed to mitigate the impacts of human activities on important seasonal wildlife habitat. The major types of seasonal wildlife habitat and the time periods in which restrictions may be needed are shown in Table 1. Approximately 60 percent (226,000 acres) of the resource area lies within areas potentially subject to restriction. During any given year, the authorized officer may waive seasonal restrictions if actual conditions do not warrant them.

TABLE 1
SEASONAL WILDLIFE RESTRICTIONS

Habitat	Restricted Period
Big Game Winter Range (Deer/Elk/Bighorn)	11/15 - 03/15
Elk Rut Areas	08/15 - 10/01
Elk Calving Areas	04/30 - 06/30
Raptor Nest Sites	Dates vary by species
Sage Grouse Strutting Grounds	03/01 - 04/30
Sage Grouse Nesting & Broodrearing	04/30 - 06/30
Antelope Fawning Grounds	05/01 - 06/30
Antelope Winter Ranges	11/15 - 03/15

Threatened, Endangered, and Sensitive Species Habitat

Whenever possible, management activities in habitat for threatened, endangered, or sensitive species will be designed to benefit those species through habitat improvement.

The Idaho Department of Fish and Game and the U.S. Fish and Wildlife Service will be consulted prior to implementing projects that may affect habitat for threatened and endangered species. If a "may affect" situation is determined through the BLM biological assessment process, consultation with the U.S. Fish and Wildlife Service will be initiated in accordance with Section 7 of the Endangered Species Act of 1973, as amended. All activities occurring within the interagency wolf coordination zone (east of Idaho Highway 28 between Kenney Creek and Eighteenmile Creek) will be subject to Section 7 consultation.

Table 2 shows species and areas where all management activities will be analyzed for possible impacts during the writing of any activity plans or environmental assessments.

TABLE 2
T & E PLANT MANAGEMENT CONSIDERATIONS

Species	Area
Physaria didymocarpa var. lyrata	Williams Creek
	Pattee Creek
	Basin Creek
	Trail Creek
	Agency Creek
Astragalus scaphoides	Agency Creek

The only activity that would seriously impact Penstemon lemhiensis is herbicide spraying, particularly along roads. An analysis of impacts to populations of this species will be done if herbicide spraying is proposed.

Terrestrial Wildlife Habitat

Sufficient forage and cover will be provided for wildlife on seasonal habitat. Forage and cover requirements will be incorporated into allotment management plans and will apply to specific areas of primary wildlife use.

Range improvements generally will be designed to achieve both wildlife and range objectives. Existing fences will be modified and new fences will be built so as to allow wildlife passage. Water developments generally will not be established for livestock where significant conflicts with wildlife for vegetation would result.

Vegetation manipulation projects will be designed to minimize impact on wildlife habitat and to improve it whenever possible. These projects will comply with sage grouse, antelope, and mule deer management guidelines. The Idaho Department of Fish and Game will be consulted two years in advance on all vegetation manipulation projects. Animal control programs will be coordinated with the U.S. Fish and Wildlife Service.

Management actions within floodplains and wetlands will include measures to preserve, protect, and, if necessary, restore their natural functions (as required by Executive Orders 11988 and 11990 and BLM Manual 6740). Management techniques will be used to minimize the degradation of stream banks and the loss of riparian vegetation. Bridges and culverts will be designed and installed to maintain adequate fish passage.

Riparian habitat needs will be taken into consideration in developing livestock grazing systems and pasture designs. Some of the techniques that can be used to lessen impacts are:

1. Constructing shade structures in conjunction with water development away from riparian areas

2. Using prescribed fire to draw cattle away from riparian zones

3. Changing class of stock from cow/calf pairs to herded sheep or yearlings.

4. Eliminating hot season grazing or scheduling hot season grazing for only one year out of every three.

5. Locating salt away from riparian zones.

6. Laying out pasture fences so that each pasture has as much riparian habitat as possible.

7. Locating fences so that they do not confine or concentrate livestock near the riparian zone.

8. Developing alternative sources of water to lessen the grazing pressure on the riparian habitat.

9. Using temporary electric fencing.

10. Excluding livestock completely from riparian habitat as a last resort by using protective fencing.

Forestry Activities

Where applicable, the elk management guidelines contained in Elk Habitat Relations for Central Idaho (Ralphs, 1981) will be followed. These include:

1. Managing public vehicle access to maintain the habitat effectiveness of security cover and key seasonal habitat (such as winter range and calving/nursery areas) for deer and elk.

2. Maintaining adequate untreated peripheral zones around important moist sites (for example, wet sedge meadows, springs, and riparian zones).

3. Ensuring that slash depth inside clear cuts does not exceed 1 1/2 feet.

4. Generally discouraging thinning immediately adjacent to clear cuts.

Fencing

To the extent possible, fences will be located and constructed to maximize their visibility, to take advantage of flat areas (benches, saddles, etc.), and to cross contour lines.

Existing fences posing a potential or known problem to big game movement will be modified as necessary.

All new fence construction will comply with the Lemhi Resource Area fencing policy dated May 20, 1983. See Range Improvements and Treatments.

Water Development

1. Free water for use by wildlife shall be maintained at or within 1/4 mile of all spring developments. This water shall remain available for at least as long a period as predevelopment conditions provided.

2. Adequate water shall remain at spring developments to maintain any associated riparian zone.

3. Height of troughs or other water containers shall not exceed 20 inches above ground level.

4. Bird ladders or other appropriate wildlife escape devices will be installed and maintained in all water troughs.

5. As appropriate, pipelines and troughs will remain charged with water from June 15 to October 1 to provide for wildlife that has become dependent upon them. Maintenance of these projects will be negotiated between BLM, Idaho Department of Fish and Game, and the permittee.

Vegetation Manipulation

1. The Idaho Department of Fish and Game shall be given at least two years notice prior to any vegetation manipulation project.

2. Brush control projects will be designed to maximize edge effect to the extent possible. Islands of untreated sagebrush will be incorporated into project design as necessary to provide cover for sage grouse and other species.

3. Proposed brush manipulation projects on sage grouse winter and/or nesting range or antelope winter and/or fawning range must have a predicted neutral or beneficial effect on these species.

   a. The sagebrush canopy cover will not be reduced below 10 percent on sage grouse broodrearing areas.

   b. The sagebrush canopy cover will not be reduced below 20 percent on sage grouse nesting and wintering areas.

   c. The sagebrush canopy cover will not be reduced below 10 percent on general antelope ranges. Winter ranges and spring fawning areas will not be treated unless overall benefits to antelope will result.

4. Brush control proposals within 2 miles of known strutting grounds will be subject to on-site inspection by BLM and Idaho Department of Fish and Game personnel to determine prohibited areas.

5. As a rule, no brush control will be allowed within 100 yards of streams, meadows, or secondary drainages (dry and intermittent). The desirability of increasing or decreasing the width on specific areas will be determined via on-site evaluation by BLM and Idaho Department of Fish and Game personnel.

6. A mixture of grasses, forbs, and shrubs (if appropriate) will be used in all range rehabilitation or improvement projects.

Soil, Water, and Air

General

Soil, water, and air resources will continue to be evaluated on a case-by-case basis as a part of project level planning. Such an evaluation will consider the significance of the proposed projects and the sensitivity of the resources. Stipulations will be attached as appropriate to prevent adverse impacts to soil, water, and air.

Soils

Adequate cover will be maintained to keep soil erosion within tolerable limits. Recent research suggests the soil loss tolerance figure for rangeland is 1.0 ton per acre per year (personal communication with Agricultural Research Service staff).

Water

Water quality will be maintained or improved in accordance with state and federal standards. State agencies will be consulted on proposed projects that may significantly affect water quality. Management actions on public land within municipal watersheds will be designed to protect water quality and quantity.

All BLM initiated or authorized programs and actions potentially affecting wetland-riparian areas will comply with the spirit and intent of Executive Order 11990 (Wetlands Act) and BLM Policy as put forth in BLM Manual Section 6740.06. These directives stress the avoidance of (1) "...long and short-term adverse impacts associated with the destruction, loss, or degradation of wetland-riparian areas" and (2) the preservation and enhancement of "the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage."

Roads and utility corridors will avoid riparian zones to the extent practicable.

Air Quality

Under the Clean Air Act (as amended, 1977), BLM-administered lands were given a Class II air quality classification, which allows moderate deterioration associated with moderate, well-controlled industrial and population growth. The BLM will manage all public lands as Class II unless they are reclassified by the state as a result of the procedures prescribed in the Clean Air Act (as amended, 1977). Administrative actions on the public lands will comply with the air quality classification for that specific area.

Recreation

Recreation Opportunities

A broad range of outdoor recreation opportunities will continue to be provided for all segments of the public, depending on demand. Trails and other means of public access will continue to be maintained and developed where necessary to enhance recreation opportunities and allow public use. Developed recreation facilities receiving the heaviest use will receive first priority for operation and maintenance funds. Sites that cannot be maintained to acceptable health and safety standards will be closed until deficiencies are corrected. Investment of public funds for new recreation developments will be permitted only on land identified to remain in public ownership.

Recreation resources will continue to be evaluated on a case-by-case basis as a part of project-level planning. Such evaluation will consider the significance of the proposed project and the sensitivity of recreation resources in the affected area. Stipulations will be attached as appropriate to assure compatibility of projects with recreation management objectives.

Motorized Vehicle Use

Travel planning, including the designation of areas open, restricted, and closed to motorized vehicle access, will remain a high priority for public land. Public land within areas identified as open to motorized vehicle use generally will remain available for such use without restrictions. Exceptions to this general rule may be authorized after consideration of the following criteria:

1. The need to minimize damage to soil, watershed, vegetation, or other resource values.

2. The need to minimize harassment of wildlife or significant degradation of wildlife habitats.

3. The need to promote user safety.

Public land within areas currently having motorized vehicle use restrictions generally will receive priority attention during travel planning. Specific roads, trails, or portions of such areas may be closed seasonally or yearlong to all or specified types of motorized vehicle use.

Public land within areas closed to motorized vehicle use will be closed yearlong to all forms of motorized vehicle use except emergency or authorized vehicles.

Restrictions and closures will be established for specific roads, trails, or areas only where problems have been identified. Areas not designated as restricted or closed will remain open for motorized vehicle use.

Visual Resources

Visual resources will continue to be evaluated as a part of activity and project planning. Such evaluation will consider the significance of the proposed project and the visual sensitivity of the affected area. Stipulations will be attached as appropriate to maintain designated visual resource management classes.

Wilderness Resources

The Eighteenmile Wilderness Study Area (WSA) will continue to be managed in compliance with the Interim Management Policy until it is reviewed and acted upon by Congress. If all or part of this area is designated as wilderness by Congress, it will be managed under BLM's Wilderness Management Policy. A site-specific wilderness management plan will be developed to guide future management.

If all or part of the Eighteenmile WSA is not designated as wilderness, it will be managed under the multiple use guidelines set forth in this RMP.

Wild and Scenic River Area

The Salmon River from North Fork to its headwaters has been identified as a potential Wild and Scenic Study River. The area will continue to be managed to prevent unnecessary and undue degradation until it is reviewed and acted upon by Congress.

Fire

The primary fire protection objective will continue to be the control of all wildfires on or threatening public land during the first burning period. Upon completion and approval of the RMP, activity plans will be completed to accomplish the direction of the RMP guidance.

The resource area has many scattered talus mountain tops with lone or scattered trees. These would be limited suppression areas. However, each public report on a fire would have to be checked to make sure the fire was not spreading or sliding down into adjacent fuels. If found to be safe, a fire would be monitored and allowed to burn out unless too many reports were received from residents or tourists.

Fire suppression within the Eighteenmile Wilderness Study Area will follow the Interim Management Policy until the area is designated as wilderness or nonwilderness by Congress.

Prescribed burning will continue to be used in support of resource management objectives.

Cultural Resources

The BLM is required to identify, evaluate, and protect cultural resources on public lands under its jurisdiction and to ensure that Bureau initiated or Bureau authorized actions do not inadvertently harm or destroy nonfederal cultural resources. These requirements are mandated by the Antiquities Act of 1906, the Reservoir Salvage Act of 1960 as amended by P.L. 933-191, the National Historic Preservation Act of 1966 and amendments, the National Environmental Policy Act of 1969, Executive Order 11593 (1971), Section 202 of the Federal Land Policy and Management Act of 1976, and the Archeological Resources Protection Act of 1979, together with 36 CFR 800.

Prior to starting any Bureau initiated or authorized action that involves surface disturbing activities, sale, or transfer from Federal management, BLM will conduct, or cause to be conducted, a Class III (intensive) inventory as specified in BLM Manual Section 8111.4. This intensive inventory supplements previous surveys and will be done to locate, identify, and evaluate cultural resource properties in the affected areas. If

properties that may be eligible for the National Register are discovered, BLM will consult with the State Historic Preservation Officer (SHPO) and forward the documentation to the Keeper of the National Register to obtain a determination of eligibility in accordance with 36 CFR Part 63.

Since any Bureau authorized or initiated action recognizes and accommodates cultural resources by virtue of standard operating procedures, the only activity that may damage these resources is unplanned public use. Such activities include unauthorized recreational vehicle use, artifact collection, and illegal excavation for materials and antiquities. The location of these activities is impossible to predict and may occur in spite of measures designed to exclude or limit them.

Cultural resource values discovered in a proposed project or authorized action area will be protected by adhering to the following methods.

1. Avoidance. Cultural resources would be protected by redesigning or relocating the project or excluding significant cultural resource areas from development, use, or disposal.

2. Salvaging. If a project cannot be redesigned or relocated, cultural resource values will be salvaged through controlled, scientific methods pursuant to the SHPO agreement.

3. Project/Action Abandonment. If the site is determined to be of significant value or the above-mentioned methods are not considered adequate, the project will be abandoned.

All cultural sites identified as special management areas will be closed to off-road vehicle use, vegetation manipulation, and surface occupancy.

All cultural sites known to be eligible for National Register nomination or listed on the National Register will be protected from deterioration and be retained in federal ownership.

Cemetery areas or known concentrations of burials will be closed to livestock grazing. Known cemeteries or concentrations of burials will be withdrawn from mineral entry. No surface occupancy will be stipulated for known cemeteries or concentrations of burials.

Paleontological Resources

Paleontological resources will be managed to protect specimens and maintain or enhance sites or areas for their scientific and educational values.

The potential impacts to the paleontologic resources of the Lemhi Resource Area are unknown as an inventory has not yet been completed. Once an inventory is completed and site clearances become standard practice, the resource will be adequately protected.

Cadastral Survey

Cadastral surveys will continue to be conducted in support of resource management programs. Survey requirements and priorities will be determined on a yearly basis as a part of the annual work planning process.

Road and Trail Construction and Maintenance

Road and trail construction and maintenance will continue to be conducted in support of resource management objectives. Construction and maintenance requirements and priorities will be determined on a yearly basis as a part of the annual work planning process.

Investment of public funds for road and trail construction generally will be permitted only on land identified for retention in public ownership. Exceptions may be allowed where investment costs can be recovered as a part of land disposal actions.

Specific road and trail construction standards will be determined based on the following criteria:

1. Resource management needs.

2. User safety.

3. Impacts to environmental values, including but not limited to wildlife and fisheries habitat, soil stability, recreation, and scenery.

4. Construction and maintenance costs.

Detailed Management Plans

The RMP provides general guidance for the resource area. More detailed management plans called activity plans will be prepared to deal with areas where a greater level of detail is required. Activity plans will indicate specific management practices, improvements, allocations, and other information for a particular site or area. They will be prepared for most major BLM programs, including range (allotment management plans), recreation (recreation area management plans), wildlife (habitat management plans), and cultural resources (cultural resource management plans). Where two or more activities have activity planning needs in the same general area, a single consolidated activity plan may be prepared. Coordination, consultation, and public involvement are important in the formulation of activity plans. Each activity plan will be analyzed through the environmental review process and these environmental assessments will be available for public review.

Economic and Social Considerations

The BLM will ensure that any management action undertaken in connection with this plan is cost-effective and takes into account local social and economic factors. Cost-effectiveness may be determined by any method deemed appropriate by the Bureau for the specific management action involved.

Environmental Review

An environmental analysis or categorical exclusion review will be completed prior to approval of any project involving public lands. If no significant impacts are identified, the analysis will be documented through an environmental assessment and a finding of no significant impact. If the analysis suggests a major federal action that would significantly affect the human environment, an environmental impact statement (EIS) will be prepared under the direction of the BLM Idaho State Director.

SUPPORT REQUIREMENTS

Once the RMP is approved, it will require support from many sources in order to be implemented. Support requirements are shown in Table 3.

TABLE 3
SUPPORT REQUIREMENTS

SUPPORT	RESOURCE	REMARKS
Appraisal	Lands, Forestry, Range Management, Wildlife, Recreation	Appraisals must be conducted on those lands identified for transfer and acquisitions. Also access acquired for timber sales, range and wildlife projects, and recreation developments must be appraised.
Cadastral Survey	Minerals, Wildlife, Range, Lands, Forestry, Wilderness	Identification of public land boundaries may be required for actions such as: mineral disposal, land transfers, timber sales, range projects, wildlife projects, and occupancy trespass settlements.
Access	Forestry, Minerals, Range, Wildlife, Recreation, Cultural, Watershed	Legal access is required for a number of actions such as: timber sales, mineral disposal, range projects, recreation use, wildlife projects, cultural resource management, and watershed projects.
Water Rights	Watershed, Wildlife, Range	All BLM water developments require water rights.
Engineering	Range, Wildlife, Forestry, Recreation	Engineering design, review, and construction or contract preparation; administration of construction is required for range projects, recreation developments, and road building and maintenance projects

TABLE 3 (cont'd)
SUPPORT REQUIREMENTS

SUPPORT	RESOURCE	REMARKS
Fire Management	Range and Wildlife Habitat Management	Technical assistance is required for preparation of prescriptions for prescribed burning and fire management on prescribed burns designed to improve range and wildlife habitat.
	All	Fire suppression, as specified in the RMP for the protection of resource values and property.

CONSISTENCY WITH OTHER PLANS

This proposed plan does not appear to be inconsistent with the officially adopted plans, programs, or policies of other federal, state, or local governments or with Indian tribes. The public comments to date have shown no inconsistencies.

The Lemhi County Comprehensive Plan was reviewed by BLM. The Lemhi Draft RMP is consistent with the Lemhi County plan. Coordination with the U.S. Forest Service, Soil Conservation Service, Lemhi County, city of Salmon, local Lemhi Indians, and Shoshone Bannock tribe does not indicate any inconsistencies.

Agencies, governments, and Indian tribes may notify BLM of inconsistencies with their plans during the 90-day public review period. The final RMP/EIS will document inconsistencies and, if they cannot be remedied, will explain why.

The BLM planning regulations provide for a 60-day review by the Governor of BLM's proposed plans or amendments (1610.3-2(e)). The purpose of this review is to give the Governor the opportunity to identify inconsistencies between BLM's proposed plan and state or local plans, policies, or programs. A Memorandum of Understanding (May 3, 1984) with the Office of the Governor has been executed to provide for The Governor's consistency review . In accordance with this Memorandum of Understanding, the BLM has notified the Governor of the Lemhi RMP and will provide the proposed plan and associated final EIS, including BLM's responses to comments on the Draft Plan and EIS, to the Office of the Governor for the 60-day review.

IMPLEMENTATION

Decisions in the plan will be implemented over a period of years and must be tied to the BLM budgeting process. Priorities will be established to guide the order of implementation for each resource and will be reviewed annually to help develop annual work plan commitments for the coming year. New policy, Departmental guidance, or new BLM goals may influence priorities.

Detailed activity plans and environmental assessments may be needed before taking some actions such as timber harvest or range improvement construction. Rangeland improvement projects, for example, will require a site-specific analysis and a review of economic efficiency.

The following steps will be taken to implement the Proposed Plan:

1. Initially, grazing permittees will be allowed to run up to their Active Grazing Preference.

2. Develop and conduct monitoring program for each allotment.

3. Comprehensive allotment management plans will be developed to meet multiple use resource objectives.

4. Implement range improvements identified in Allotment Management Plans.

5. Adjustments in livestock use will be made after monitor data indicates the need. These adjustments could include:

   A. Change in season of use.
   B. Change in grazing system or management.
   C. Change in number of livestock.

6. Changes in kind (cattle, sheep, or horses) and class (cow/calf pairs or yearlings) would be incorporated into the AMP initially at 75% of the total calculated conversion rate. Through monitoring, the conversion could be changed from the initial level.

7. Continue to monitor to insure that resource objectives are being achieved.

MONITORING AND EVALUATION

The results of implementing the selected RMP will be examined periodically to inform the BLM resource managers and the public of the progress of the plan. The results being achieved under the plan will be compared with the plan objectives.

Monitoring and evaluation will help the resource managers to:

1. Determine whether an action is accomplishing the intended purpose.

2. Determine whether mitigating measures are satisfactory.

3. Determine if the decisions in the plan are being implemented.

4. Determine if the related plans of other agencies, governments, or Indian tribes have changed, resulting in an inconsistency with the RMP.

5. Identify any unanticipated or unpredictable effects.

6. Identify new data of significance to the plan.

The proposed monitoring and evaluation plan for the Lemhi Resource Area RMP is shown in Appendix I of the Draft Lemhi RMP/EIS. The plan specifies resource components to be monitored and how, when, and where these components will be monitored. Monitoring intensity (the number and frequency of studies) will vary among areas and allotments according to the amount of information that is needed to determine if the plan objectives are being met. If future monitoring shows that important RMP objectives are not being met, the reasons will be examined closely. An RMP decision may need to be changed even if the problem is due to factors beyond BLM's control, such as changes in the climate or economic factors.

CORRECTION SHEET

The correction list that follows are changes that have been made to Part II and III of the text of the Draft RMP/EIS. Some of the corrections were the result of response to comments and the remainder were a result of internal review. Changes in Part I of the Draft are reflected in the preceeding Proposed RMP.

Pg. i - 1st paragraph, last sentence:

Change "input" to "impact".

Pg. xii - 2nd paragraph, 2nd sentence:

Change "set-aside" to "set-asides" and delete the word "withdrawal".

Pg. xiv - 1st paragraph, 1st sentence:

Change "set-aside" to "set-asides" and delete the word "withdrawal".

Pg. xviii - Under Environmental Consequences Summary, 2nd sentence:

Change Minerals management to Minerals activity.

Pg. xix - 1st paragraph, 5th sentence:

Change "Mineral sales could not occur" to "mineral sales would not be allowed".

Pg. xix - 4th paragraph, 1st sentence:

Change deer population to 9,350 and change AUMS from 6,749 to 6,466.

Pg. xx - Under Environmental Consequences Summary, 2nd sentence:

Change to read: "The amount of land closed to minerals activity would be slightly increased."

Pg. xxi - Under Environmental Consequences Summary, 2nd sentence:

Change "Minerals management" to "Minerals activity".

Pg. 2-2 - "NO TIMBER HARVEST", 4th sentence:

Replace "the timber industry..."sentence with the following: "The timber industry in Lemhi County is already in a severely depressed condition. This alternative would have reduced the availability of economically viable timber sales and thus would have been unacceptable to the people of Lemhi County." (Replaces two sentences!)

Pg. 2-3 - bottom of the page:

The following words were omitted and will be added: ...of wildlife values; and about 31,767 acres would be leased with a "no surface occupancy" stipulation for the protection of recreation, watershed,....

Pg. 2-7 - last line:

Remove last line to facilitate...by adjust.

Pg. 2-9 - Under Forest Management, 2nd sentence:

Change "critical" to "crucial".

Pg. 2-10 - 6th paragraph, 2nd sentence:

Change "61,190 AUMs" to "61,910 AUMs".

Pg. 2-17 - Under Forest Management, 2nd sentence:

Change "critical" to "crucial".

Pg. 2-20 - 5th paragraph:

In sentence preceeding HMP list, change "six" to "seven"; insert in list following last entry for elk/bighorn, "antelope/sage grouse", "Upper Lemhi", "39,000".

Pg. 2-25 - Under Forest Management, 2nd sentence:

Change "critical" to "crucial".

Pg. 2-31 - bottom of the page:

The following words were omitted and will be added: ...available with seasonal occupancy restrictions, primarily for the protection of wildlife values; and about 36,469 acres would be available only....

Pg. 2-39 - Under Forest Management, 2nd sentence:

Change "critical" to "crucial".

Pg. 2-41 - 5th paragraph, first item:

Should read: "No significant conflicts with other resources were identified at the proposed stocking level."

Pg. 2-42 - last paragraph, last sentence:

Change 6,749 AUMs to 6,466; change deer from 10,113 to 9,350.

Pg. 2-42 - 6th paragraph:

In sentence preceeding HMP list, change "six" to "seven"; insert in list following last entry for elk/bighorn, "antelope/sage grouse", "Upper Lemhi", "39,000".

Pg. 2-44 - 2nd full paragraph, last sentence:

Should read: "Surface-disturbing activities adversely affecting Class III streams would be avoided."

Pg. 2-47 - Under Forest Management, 2nd sentence:

Change "critical" to "crucial".

Pg. 2-51 - Table 2-1:

Under input to crucial Wildlife Habitat Alternatives F and G, change deer +35% to read deer +25%.

Pg. 3-9 - 2nd paragraph:

Delete 4th sentence.

Pg. 3-15 - 5th paragraph, 1st sentence:

Rewrite as follows: "Although elk were historically common in this area, none were known to exist at the turn of the century (Anderson, 1979)."

Pg. 3-17 - 4th paragraph:

Will be changed to read: "All perennial streams not included in these four categories are considered 'unclassified' and will be evaluated prior to the implementation of management activities."

Pg. 3-35 - 4th paragraph, 3rd sentence:

Change AUM to animal unit.

Pg. 3-37 - 4th paragraph:

Replace 1st sentence with: "Since 1982, the lumber industry in Lemhi County has been quite unstable, with sporadic closings of the lone sawmill."

Pg. 4-2 - After Number 1:

Change "Give" to "Given".

Pg. 4-4 - top of the page:

Add the following:

Impacts to Energy and Mineral Availability:

Over 99 percent of the resource area would be available for mineral location, leasing, and 94 percent would be open for mineral material disposal under this alternative.

Pg. 4-20 - 4th paragraph, 1st sentence:

Change 72 percent to 12 percent.

Pg. 4-22 - 4th paragraph, 1st sentence:

Change 63,898 AUMs to 61,910 AUMs.

Pg. 4-36 - 3rd paragraph, 4th sentence:

Change 25 miles to 12 miles.

Pg. 4-67 - 5th paragraph, 1st and 2nd sentences:

Change 1st sentence to read: and ...and the Salmon River Corridor.

Change 2nd sentence to read: ...been little historic use ... from the WSA area ...

A 5th sentence will be added to read: Demand is moderate in the Salmon River Corridor and this alternative will increase haul distances when existing sources are exhausted.

Pg. 4-79 - 4th paragraph, 5th sentence:

Should read: ...up to 25 miles within the Salmon River Corridor,...

Pg. 4-84 - 6th paragraph:

Change deer percent increase from 35 to 25.

Pg. 4-84 - 9th paragraph:

Change deer increase from 2,600 to 1,950 and their percent increase from 35 to 25.

Pg. 4-95 - 1st paragraph, 2nd sentence:

Should read: ...crusher sites within the Salmon River Corridor...

Pg. 4-101 - paragraph 3, 1st sentence:

Should read: A total of 225 acres...

Pg. 5-9 - Add to Bibliography:

Anderson, L.D. 1979. Elk of the Upper Salmon River - A Brief History. Bureau of Land Management, Salmon District Office, Idaho. 8 pp.

Pg. 5-24:

Add the following definition: "Intensive Management: A high level of forest management intensity often characterized by silvicultural treatments (i.e., thinnings, planting of genetically improved stock, control of competing vegetation, etc.) aimed at increasing the growth and yield of a regulated stand."

Pg. 5-26 - Glossary Low Mineral Potential:

The area has no reported mineral occurrences, mining claims, or known mineral value.

Pg. 5-28 - Glossary Prospectively Valuable:

An evaluation ...the discovery of leasable mineral resources.

Pg. A-1 - 1st paragraph, 3rd sentence:

Should read: ...indicated interest. The true potential of any lands is never fully known until extensive exploration is completed.

Pg. A-1 - 3rd paragraph, 1st sentence:

Should read: ..."Computerized Resource Information Bank" (CRIB) were...

Pg. A-1 - 3rd paragraph, 4th sentence:

Should read: ...any deposits reported in the CRIB data.

Pg. B-11 - Item number 3:

Should read: ...would not change existing trends.

Pg. G-23 - 3rd paragraph:

Add: All water quality standards set forth by state and federal regulations will be complied with. But, accidents could lead to noncompliance with water quality standards.

Pg. G-23 - 5th paragraph, 2nd sentence:

Will read: Sediment levels could exceed standards set by EPA.

Pg. I-3 - End of Table I-1:

Add the following:

Appendix 1: Resource Monitoring and Evaluation Plan

Element	Item	Location	Technique	Unit of Measure
Threatened & Endangered	Population Dynamics	Williams Cr. gravel pit	Slope Stability panoramic photo points	Population density & frequency

Frequency	Information Warranting A Decision Change	Annual Cost
Annually	Downward Population Trends	$3000

The Lemhi Draft Resource Management Plan and Environmental Impact Statement was released to the Environmental Protection Agency and the public in October, 1985. During the public comment period, which ended January 13, 1986, testimony was received at a formal hearing and in 194 letters. A verbatum record of the hearing is reproduced in this document, along with the comment letters. A number of similar letters were received and were combined for response purposes. Letter number 63 represents 110 similar letters, and letter number 64 represents 20 similar letters. Substantive comments are identified and numbered on the hearing record or the appropriate letters. The BLM responses follow the hearing and letter section. Substantive comments are those that question the adequacy or correctness of the data or analysis, or provide new information.

The hearing record is listed and reproduced on the following table:

HEARING COMMENT #	FROM	SUBSTANTIVE COMMENTS RESPONSE PREPARED
H1	Jack Ellis (statement for Lemhi Cattle and Horse Growers Association)	X
H2	Heather Thomas	
H3	James Whittaker	X

STATE OF IDAHO

PUBLIC HEARING RE)
)
LEMHI RESOURCE MANAGEMENT) TRANSCRIPT OF HEARING
)
DRAFT PLAN)
)

Hearing before HAROLD RAMSBACHER, Hearing Officer, at the Salmon Public Library, Salmon, Idaho, November 20, 1985, at 7:30 p.m.

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INDEX

Page

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BLM Representatives: JERRY WILFONG, Lemhi Area Manager
HARLEY METZ, Team Leader
DAVE WOLF, District Wilderness Coordinator

Speakers: JACK F. ELLIS H 1

HEATHER THOMAS H 2

JAMES WHITTAKER H 3

PROCEEDINGS

THE HEARING OFFICER: I think most of the people have signed in; so we'll start the meeting. My name is Hal Ramsbacher. I'm the deputy state director for renewable resources at the Idaho State Office, Bureau of Land Management. I've been designated by the state director, Delmar Vail, to chair this meeting. Other BLM representatives from the Salmon District here tonight are: district manager, Xen Walker, sitting in the back of the room; Grant Harber, the sergeant-at-arms; and at the head table at my right we have Jerry Wilfong, the Lemhi area manager; Harley Metz, the team leader for the EIS; and Dave Wolf, district wilderness coordinator.

The purpose of tonight's meeting is twofold. First, it meets the requirements of the Wilderness Act to obtain public comment concerning suitability or nonsuitability of the eighteen mile Wilderness Study Area for inclusion in the National Wilderness Preservation System.

The second purpose of this meeting is to receive comments on the adequacy of the alternatives, the impact analysis, and other information documented in the Draft Environmental Impact Statement or the Lemhi Resource Management Plan. This Resource Management Plan and its alternatives cover more than four hundred fifty-nine thousand acres of BLM-administered land in Lemhi County.

I would now like to explain the procedures that we will follow tonight. Rebecca Myers, our court reporter, will make a verbatim transcript of this hearing. All presentations while we are in session will be reported by the reporter to ensure a complete and accurate record. Comments received tonight plus all previously received statements and any comments or any future statements or comments received through January 13, 1986, will be considered in the presentation of the proposed Resource Management Plan and final Environmental Impact Statement. That plan and EIS are scheduled to be released in May, 1986. A decision on the plan and state director approval will be made no sooner than thirty days after release of the final EIS. That decision will have no commitments for the management of the Wilderness Study Area other than to preserve the existing characteristics pending Congressional consideration and action.

In addition to the proposed Resource Management Plan and final EIS, a separate Wilderness EIS and Wilderness Study Report will be forwarded to the Secretary of Interior and the President for their review and recommendations. Ultimately, Congress will make the final decision as to whether any areas will be designated wilderness. The release date for that final Wilderness EIS has not yet been scheduled.

Tonight's speakers will be called in the order in which they were signed in at the reception table. There's a ten-minute time limit for each presentation, and that will apply even though you may represent more than one party. Only one person may speak at a time, and no one will be recognized to speak other than the person presenting the statement. This is necessary so that the court reporter can produce an accurate copy of tonight's proceedings. If any speaker has an extra copy of a prepared statement, the reporter will appreciate receiving it just before or just after the presentation.

If you wish to give a supplemental statement and you don't have time for the oral presentation, you can submit it later in written form. As I mentioned earlier, all your comments must be received in the Salmon District Office by the close of business on January 13, 1986.

Later in the evening after all persons who have requested to speak have finished and if time is available I will consider requests for supplementary oral statements or statements from those who did not sign up to speak at the start of the hearing. These statements will also be limited to ten minutes. There will be no interrogations of speakers; however, BLM representatives are permitted to ask questions of the speakers for clarification. In that regard the BLM representatives are not required to respond

to statements made by the speakers. In other words, this is not an open public meeting where BLM responds to questions or comments from the floor. It is a hearing to record your statements only. The district people have informed me that they would be more than welcome to receive you at the District Office and go over any of your concerns or clear up any points that you may have at that time.

When you come to the podium, please give me your name, address, and state whom you represent. If you wish to submit additional written testimony, you may hand it to the reporter, and it will be marked as an exhibit. We will notify you when you have one minute remaining of your ten minutes. I'll try to do that, but you might get the dong. Being we only have a few people signed up, I would imagine that after it dongs we can probably give you one minute to finish up. We won't keep anybody up too late. So once you hear the dong, then take about one minute to summarize.

One final announcement: this is a public meeting, and I ask that you do not smoke. We will take a ten-minute break during each hour, and if the hour happens to come while somebody is speaking we'll wait until you're finished. Are there any questions before we call on our first speaker?

(No response)

THE HEARING EXAMINER: If not, then our first speaker will be Mr. Jack Ellis.

H1

JACK ELLIS

MR. ELLIS: That's what I get for being here first. My name is Jack Ellis, address, Box 301, Salmon, Idaho. This is the statement of the Lemhi Cattle and Horse Growers Association: I am Jack Ellis, president of the association, representing one hundred eighteen livestock members. The directors of the association are agreed that they can live with Alternative G in the proposed Lemhi Resource Management Plan. At present the association favors no further wilderness in Lemhi County. We feel that the approximately four hundred twenty-six thousand acres of the River of No Return Wilderness in the county is sufficient to lock up. There are, however, a number of items in this proposal which require further discussion and study.

One of the items of greatest concern to stockmen is the reimposition of forage productivity/forage allocation schemes into the management equation. It has been shown repeatedly that we are unable to quantify forage production H1-1 with any degree of precision in the cold desert areas of the country. How then can we set aside some unknown quantity of feed for wildlife then subtract this from total production and arrive at some figure remaining for livestock use? Since we are unable to make this quantification, we should drop this part of the discussion in the proposed plan.

Also regarding wildlife, we may be near ungulate wildlife populations which are sustainable given the limited amount of winter range and the increasing wildlife deprivation problem on the private lands within the resource area. Perhaps we don't need to plan to handle many more ungulate wildlife than current populations. H1-2

Another item requiring discussion is fencing and fence construction standards. Public safety in some instances requires more than three-wire fences, especially along public highway rights of way. In other areas livestock pressure because of topography will require substantial fencing to assure some degree of control or to prohibit excessive maintenance costs. H1-3

We agree with the bureau's contention that repetitive early spring grazing can lead to reduced plant vigor and a down trend in range condition; however, most of the problems in the Lemhi Resource Area are caused by lack of AMP's, which lead to improved grazing use, not turn-out date per se. It needs to be recognized in the plan that a lot of the early range is ephemeral; that is, the range desiccates so rapidly that if it is not used early it is not available. In addition, water availability is a problem on many of the lower ranges. They can be used early when precipitation and snow melt provide potholes and intermittent streams. As this water is lost, the range is unavailable for

and eminently unsatisfactory solution to the problem. Bryant found that riparian areas responded much more rapidly to almost any grazing treatment except season-long use at constant stocking rates than to exclusion of grazing. H1-5

THE HEARING OFFICER: I think I'm going to dispense with this buzzer. You can probably hear it in the back of the room ticking. Heather Thomas.

HEATHER THOMAS **H2**

MS. THOMAS: This is just a summary of a longer written statement I'd like to send later. I can still send one later, can't I?

THE HEARING OFFICER: You bet.

MS. THOMAS: My name is Heather Thomas, Box 215, Salmon, Idaho. I'm representing myself.

This EIS is of great concern to ranchers who depend on the range. Ever since the Taylor Grazing Act ranchers have been working with the agency to improve their allotments, and most ranges are in good shape today. Range trend has definitely been upward.

UNIDENTIFIED SPEAKER: Excuse me, people in the back can't hear you. Do we have a speaker system or anything, or could we rearrange that?

(Brief recess)

THE HEARING OFFICER: Start over, please,

use.

The final item which requires clarification is the arbitrary acre/AUN figure which is used as a starting point for determinine stocking rate. Range sites in the Lemhi area vary from two to three acres/AUM to as much as forty acres/AUM. It will require a good deal of monitoring and further study to determine that a stocking level needs to be reduced just because the allotment does not reach the arbitrary nine acre/AUM figure used in this document. H1-4

The emohasis on riparian lands in this document is warranted. There is no question that the riparian lands are the most preferred habitat for many wildlife species and are the most productive lands in most allotments. The suggestion that all riparian problems are a result of poor livestock grazing management is unwarranted. The work of Larry Bryant in Oregon and observation in this area will quickly demonstrate that accelerated stream bank erosion attributable to livestock is almost immeasurable. Rapid stream runoff and icing contribute a much greater magnitude of bank erosion and stream bed sedimentation than any other cause. We agree that grazing systems to provide some degree or period of rest for riparian area will alleviate most problems.

Again, citing the work of Bryant and co-workers, fencing to prohibit livestock grazing is an almost unworkable H1-6

Heather.

MS. THOMAS: This EIS is of great concern to ranchers who depend on the range. Ever since the Taylor Grazing Act ranchers have been working with the agency to improve their allotments, and most ranges are in good shape today. Range trend has definitely been upward.

So we read the draft EIS with disbelief and frustration. It is written with a very negative view of grazing. It looks at cattle as something damaging rather than beneficial and natural. The main emphasis of the document seems to be enhancement of wildlife habitat and populations and the feeling that wildlife and livestock are basically incompatible, which they are not.

Economic impacts addressed in the EIS don't adequately reflect the adverse impact upon affected ranchers and subsequently the community and county that would occur if these ranchers have to take the proposed cuts. There are some inaccurate conclusions regarding ecology, impacts of livestock on wildlife, soil erosion, riparian areas. The means used to determine proper stocking rates and proposed cuts are questionable.

It's frustrating to the rancher to be confronted with this huge document that so importantly affects his life and be given only a few weeks to respond to it when BLM had several years to do the EIS.

BLM employees get paid no matter how it turns out. Most of them will move on; so it may not matter to them how it turns out. It may not matter whether inventories and decisions are correct, figures here, lines on a map there. So what if a bunch of ranchers' future is at stake? If a mistake is made or a vegetation site is poorly chosen or a site write-up is left off the map by mistake, who cares? The BLM employee gets paid all the same, but the rancher sees the errors that make his range look worse than it really is, the soil studies and vegetation write-ups that may affect his whole future that were done in an afternoon by a temporary employee who may have been in a hurry or lost or unable to cover the whole range to get a truly representative sampling, and he is totally frustrated.

All through the EIS it is assumed that grazing causes decline in wildlife habitat and numbers, destruction of riparian areas, damage to soil and watershed. I could list twenty references, but this attitude is maybe summarized by the statement on page twelve: hunting and fishing are extremely important to the local economy. Wildlife populations can be threatened when habitat is used for livestock grazing, timber harvest, or other uses.

BLM seems to think wildlife are more valuable than livestock or timber or perhaps feels wildlife interests have more political clout. This is sad because wildlife and

livestock are compatible and have been doing very well together on our ranges with wildlife numbers greatly increasing in recent years. Yet BLM assumes there is a conflict and is proposing to reduce livestock to have even more wildlife to satisfy the goals of Fish and Game for increased game numbers even though many areas already have such expanding populations they are encroaching on private lands with elk getting into haystacks, deer and antelope decimating hay crops, not because BLM habitat outside the fence is poor but because the alfalfa inside the fence is just too tempting.

Ranchers want good conditions for wildlife also, but we're not sure we want as much expansion in numbers as Fish and Game and BLM are shooting for, no pun intended. The preferred alternative of BLM meets the Fish and Game projected population goals for big game and isn't much different from alternative C, which would maximize wildlife and restrict other uses.

So BLM wants to increase wildlife and reduce livestock even though the two are compatible and complimentary. Deer and antelope eat more browse and forbs than grass. Cattle keep elk range healthy by keeping down old rank growth. Regrowth is always more palatable and nutritious. Grazing was shown to greatly improve elk winter range in a study in Oregon. Grazing also improves sage grouse habitat, as

shown by a two-year study in Nevada, and also benefits birds like curlew, mountain plover, horned lark, to name a few, that perfer short vegetation and nesting sites with maximum visibility.

Cattle fill an important ecological niche left by the buffalo. There are a number of wildlife species dependent upon conditions created by large grazing herbivores. We have to remember that buffalo grazed these ranges for thousands of years and that native wildlife coexist with bovine grazers very well.

Some people think that streams are delicate parts of the environment and that in pristine conditions they were never trampled or overgrazed. Not so. Buffalo had more impact on stream banks than our cattle. They traveled in much larger herds.

Most streams in North America have been impacted by grazers for thousands of years. Yet fish survived. Stream bank vegetation survived. Mother Nature has been compromising for a long time.

Hooved animals actually decrease stream bank erosion by slooping the banks. Without this sloping effect you have more undercut banks that are toppled into the stream during high water, adding more silt all at once than is added during the whole year from grazing impact. And when undercut banks topple with the added force of spring runoff, they may take

trees and bushes with them impeding the channel, causing more cutting and new channels, contributing more destruction and erosion than if the banks had been sloped by cattle and less vulnerable to undercutting. Natural erosion does more damage than livestock, and riparian areas usually bounce back faster than surrounding arid land when grazed because of more rapid regrowth potential, more available stored moisture.

The EIS acknowledges that grazing is important economically, maintaining most of the livestock operations. Yet the BLM proposes to cut many permits. BLM keeps trying to assure us that these cuts won't be implemented without further study and that after the cuts are made we would eventually get the numbers back, but they said the same thing in 1964. Improvements were made. The grass increased, but livestock numbers were never restored. Now they propose to cut us again giving the same old promises. But why cut when ranges improved after the early cuts?

It's hard to convince BLM the range has improved when they didn't do any monitoring or trend studies after the last cuts to see how the range responded. BLM people involved in those earlier actions are long gone. BLM has no continuity, no consistency, keeps no promises. Other uses come along that have to be considered. Other priorities come to the front. Policies change.

That's why the rancher doesn't trust the BLM and is reluctant to agree to a cut. Range managers come and go while the rancher has to stay on the land, pick up the pieces, and adjust to each new policy with no guarantee of tomorrow. A new manager, a new policy, may make it all different. We have no guarantee BLM will give our numbers back if we give them up. They didn't before.

The EIS states that actual farm income in Lemhi County declined fifteen percent since 1978 and that after adjusting for inflation this decline was forty-two percent. It's really hard to stay in business at that rate; yet BLM proposes to cut most of our allotments. If reductions jeopardize the ranchers' ability to continue, it has serious economic repercussions for the whole county. If we manage to stay in business, if we have to look for private pasture to rent because our range numbers are cut, this would make so much competition for the limited private pasture that it would become higher priced and even the nonrange ranchers would also be affected.

The EIS lists several alternatives, most of which aren't entirely realistic. Alternative A, the existing situation, seems the most realistic, least damaging to current uses, and least costly to the taxpayer.

Alternative B maximizes livestock, but it portrays such a grim picture of environmental consequences even with

budgets do we really want a more costly program when the existing situation seems adequate with its improving range conditions and expanding wildlife populations? Can we afford a more expensive program that will have an adverse effect on range users? Why not stick with the existing situation with beneficial results at much less cost?

Let's continue to work on range problems and conflicts on a case-by-case basis, which is really the only way you can solve them, not with some blanket plan, make improvements where needed instead of adopting a costly plan that looks suspiciously like the dream plan of Fish and Game with ranchers coming out on the short end.

One of the truest statements in the EIS is on page three fourteen, quote, from a historical prospective general range condition is probably the best it has been in about the last one hundred years. I agree. Thank you.

I can give this to you if I can give a longer comment later, too, is that all right?

THE HEARING OFFICER: Oh, yes. Jim Thompson.

MR. THOMPSON: I don't wish to make a statement at this time.

THE HEARING OFFICER: Okay. James Whittaker.

JAMES WHITTAKER **H3**

MR. WHITTAKER: If I'd have thought a little

the tremendous BLM expenditures for improvements that few would choose it.

Alternative C maximizes wildlife and cuts livestock numbers ridiculously low. There would be so much grass left most years that we'd have a fire hazard.

Alternative D maximizes mineral development with a doomsday picture for wildlife, watershed, and environment.

Alternative E maximizes timber but is claimed to be detrimental to wildlife, cultural and wilderness values. BLM seems to think timber management and elk are incompatible even though elk seem to do well in logged, regrowth areas.

BLM's preferred alternative F claims to give no special emphasis to any one resource and to have balanced multiple use management. Yet BLM plans to increase game populations almost as high as in C, same budget for wildlife projects, increasing deer by three thousand head, elk by two hundred, and antelope one hundred fifty. Projected management costs for all alternatives except the existing conditions are high. Highest is B at over two million dollars. Next highest is BLM's preferred F at one million seven hundred twenty-one thousand, but even with all these costly improvements livestock will be cut. By contract the existing management, alternative A, is costing only one hundred forty-six thousand one hundred dollars.

In these days of trying to cut taxes and balance

sooner, I'd have brought a rope and just had the environmentalists and I guess the BLM and livestock and everybody just stand up here and we'd have had a tug of war and decided this tonight. But anyway, testimony on the draft resource and environmental impact statement for the Lemhi Resource Area. I'm James Whittaker, Leodore livestock operator. First I'd like to commend the Lemhi resource management team for doing an admirable job on the task set before them. The various alternatives certainly represent everyone's interest, but it's very apparent that we have a different team there than we had. I don't know if it was twenty years ago or fifteen years ago, but anyway from the last time that alternative A was apparently drawn up.

After a thorough review of the draft and all alternatives these are the points that I'd like you to ponder. Fiscal responsibility, as far as I'm concerned, this should have been the number one issue. I don't know. It seems like at this time, why, when we have such huge federal deficits and everything that it's got to be the number one issue; and it wasn't brought up. We had nine other issues, but fiscal responsibility wasn't one of them. But I want to go over some costs here. Heather already explained some of them, but management costs of alternative A, the existing situation, would cost an additional a hundred sixty-four thousand. B would be two million two hundred sixty-seven

thousand seventy. C would be one million six hundred twenty-six thousand seven hundred sixty-six. D would be one million three hundred eighty-two thousand three hundred forty. Alternative E would be one million five hundred ninety-seven thousand four hundred seventy-seven. The preferred alternative F would be one million seven hundred twenty-one thousand six hundred eighty-seven, which is approximately a hundred twenty percent of the existing situation.

Now, can we afford that right now? I don't think we can. I don't think we can. The revenues generated are fairly consistent, running around five hundred fifty thousand dollars. The receipts received from all the alternatives are fairly consistent, around four hundred eighty thousand dollars coming back to our county and state government here in Idaho. And for alternative G, the economic impacts are largely the same as for alternative F.

It might be well to reiterate where the revenues are generated and that they're fairly consistent among all the alternatives. Number one is grazing fees, seventy-one thousand seven hundred. Now, this really isn't truly representative of the amount. That's the total dollars all right, but how many permittees in this room are putting in money every year just using our own as an example?

I've been pretty well associated for the last

twenty-five years, and I can remember when the range was adjudicated, and my father was on the BLM Advisory Board at that time. He was one of the two guys in the United States that served the full length of the time from the time that advisory board was initiated until it went out of existence. But in that length of time we're running right close to fifty miles of fence. That's two miles of fence we put in each year. We also put in approximately twenty-five miles of pipeline. On that fifty miles of fence, why, the material was furnished. A lot of it was on the Gilmore Summit on that right of way fence, and I personally with a crew built that fence up over there on a contract from my father. And he put up all the money for the actual construction of the fence. We didn't furnish the material, but nearly all the fence that's up there, why, we furnished the construction for it. And if you figured that on today's figures of approximately twelve hundred dollars a mile, why, we've got sixty thousand dollars right there. Plus we've got twenty-five miles of pipeline. I didn't calculate that. Plus we bought a lot of those AUM's and made as high as I think in the fifties I think we paid for the last ones. I don't know. Maybe I have a weighted point of view -- I really do -- because I've got an investment out there, and I don't think most of these recreationists have an investment out there.

But to top it all off, when my mother died in 1971, why, the IRS come in. They think a little different than the BLM and Forest Service. They said, "Hey, you've got a valuation out there." So they figured them up. I don't remember the exact figures, but I think the tax was figured at twenty-five percent. So they apparently gave two hundred thousand dollars valuation that we had out there. We paid twenty-five thousand dollars taxes on this. Well, then we come along and just like has already been mentioned people change. Times change. But the livestock operator out there, he stays the same, and he tries to make a living out there.

And we got out and we maintained those troughs. We go out and check them three times a week. They want to put bird ladders in them. In the last summer I think I've seen half a dozen birds in water troughs out there that died. They weren't bald eagles or that other bird that's up for extinction. Now, is it really feasible to go in and require bird ladders in all these water troughs?

Not only that, but we had a larkspur problem here. Oh, it's been about three or four years ago now. I think you remember that we dropped about twenty-six cows and two bulls off there in twenty-four hours. And at that time I figured cows were worth five hundred dollars. So there's thirteen thousand plus two bulls at a thousand dollars apiece.

There's another fifteen thousand. The next year we dropped another seventeen.

Anyway, we're getting quite a sizable investment out there. If you'll look as you drive out through there, why, I see plenty of antelope and plenty of deer. And they're using our water facilities; and we're maintaining them for these environmentalists all the time.

But, anyway, I'll get back to my prepared text. I don't know. Some of those things just get to eating on me a little bit because when I go on down their list I see mineral leasing, four hundred ten thousand. These boys are paying their fair share. Land sales, thirty-six thousand one hundred. Timber sales, thirty-five thousand two hundred. And I think considering the areas that's included here, why, maybe that's realistic.

Then I come down to recreation fees, and it's consistent on all these. Five hundred dollars? Five hundred dollars on five hundred thousand acres? Boy, that's really a return, isn't it?

And these environmentalists, I looked in the back section there. They had all the agencies that had been contacted, and I see that eight of them are environmental organizations. How many were livestock or resource industry organizations? Five. So you know why I didn't bring that rope tonight. We'd all have been off the cliff in a hole.

We damn near are now.

To further restrict and increase our costs of doing business without a commensurate increase in production goals for our resource industries certainly will not help Lemhi County.

Stocking levels, alternative A, the five-year average use was the base line used to determine the proposed stocking level. Now, that sounds kind of realistic to me.

Alternative B, the proposed stocking level was based on improvement of one-third of the total acres in fair condition. Now, that sounds good, but sometimes what the BLM expects us to do and what they actually do are two different things. So this may be something down the road on that.

C, D, E, F, and G are all based on from nine to fifteen acres per AUM. Now, this really isn't a viable alternative when range sites vary from two to three acres per AUM to as much as forty acres per AUM.

Game populations, I believe our present wildlife populations are about all that are sustainable considering we have a limited amount of winter range and the increasing wildlife deprivation problem on the private lands that is materializing. We already had elk in the haystacks up there now.

This is kind of an unusual year. We may find out this

as I remember right, according to his talk. I went up to it at Challis the other day. Also grazing was actually beneficial because it prevented the old grasses from becoming matted, thus reducing the production. Fencing to prevent livestock grazing is not the answer.

H3-2

Fence standards, fence standards need to be modified to meet the situation. Road right of ways need at least a four barbed, sixteen-inch bottom, forty-six inch top wire for public safety.

I really don't know whether this is adequate or not. There was probably two weeks straight -- this year was a little dry year, and we had a little increased pressure up there on Gilmore Summit; but I still lost two cows and a calf. There was two weeks straight we went up there every night just to check on that, make sure we had them off the road. We still didn't. We supposedly went along that fence and maintained good four-barb wire fence, but for some reason those calves could always find their way out.

They have a libel suit now up on Yankee Fork. It's in the million dollar range for livestock getting out on the highway, right of way. So we certainly don't want to decrease our fence standards along any public right of ways.

This fence is necessary in other places because of topography, class of livestock, sheep, yearling cattle.

A three-barb wire fence certainly won't hold yearling

year that we have too many game if we have heavy snow this early and it hangs on late. My father said that the last drought -- he's been predicting an early winter all the time. He said, "Prepare yourself, Son. Tough times is here." And I think maybe he's right. He said that he remembered -- his father's home ranch was just back of ours. He said that the last time it had a drought year like this up there that the snow come on there in October, the first day of May there wasn't a bare spot on the ranch. So we might just be on the verge of this iceberg of this depredation problem.

Forage allocation for wildlife, it's not really quantifiable to any degree of accuracy at this time. I feel it's premature. It should have been left out of the statement altogether.

H3-1

Riparian Habitats, a Problem or an Opportunity, a speech by Larry Bryant of Starky Range Experiment Station, LeGrande, Oregon. His research proved that stream bank erosion attributable to livestock is almost immeasurable, that rapid spring runoff and icing contribute a much greater magniture of bank erosion and stream bed sediment than any other cause.

He had one illustration there where fourteen feet had been wiped out in five minutes. They're actually measuring livestock erosion in centimeters, four to five,

cattle. It certainly won't hold sheep at all. Four barb will kind of hold sheep until we take the wool off. Then it won't.

Before any fences are modified there should be proof that they are restricting game animals. I have yet to see any game animals restricted for over about five seconds going down that road.

Just right out of Leadore is a real good illustration. That fence doesn't run a quarter mile from the creek, but these deer like to go up that creek. You better go a little easy when you go across Big Timber Creek because they're going to be on that road and jumping that fence. They're restricted right there for just five seconds to make up their mind to jump over that fence instead of going out to the cattle guard and around where there isn't any fence. I've never seen a deer do that all the time I've been there. Pictures should be taken with dates and times as evidence. As far as I'm concerned, why, that's no alternative at all. We can get a new employee at BLM that's wildlife minded, and he suspects that my fence is restricting game. Why, I just can't bite that one off. I got to live with that for the next twenty-five years or so.

Early spring grazing, most of the problems are caused by the lack of an allotment management plan where the units would be rotated.

I'll agree that these plants can be eaten off too early, but I think that we've come to a point now in time that the livestock industry realizes that in order to have cows make money they have to breed on time in sixty-day breeding season. In order to do this the feed had to be adequate out there on the BLM when you breed out there, which we do. To set the date back, why, on a dry year or an exceedingly early year, why, the change in management -- the BLM can't fluctuate, but we can fluctuate. If the feed's not there, why, we don't put the animals out there is about what it amounts to.

I know there's a lot of opinion on that. You come up and say, there isn't grass, but the cattle are doing good. Why, as far as I'm concerned, there is adequate grass cover out there.

Some of these ranges could be reseeded to crested wheat grass and greatly increase the carrying capacity for livestock and game. We don't have to reinvent the wheel on this crested wheat thing. It's proven up there. We've got it up on my Uncle Bob Adams's. We've got a lot on my own there. We had seven to ten head of antelope that come and go through a woven wire fence and three barbs there to summer in our crested wheat for the last three years, and to say that game don't like that or that the fence is restricting game, why, I haven't hardly seen any game

restricted on account of a fence. If they want an alfalfa patch or crested wheat feeding, why, they go there.

Minimum stream flow, those advocating minimum stream flow in Big Timber Creek do not realize the amount of water it takes from the mouth of the canyon to the Lemhi River or for that matter from Garner's Ditch to the Lemhi River.

The creek owners were apparently all in compliance with this because McCrays have always had a right out of Timber Creek, and this last year it was exchanged to Lloyd Garner for a right out of Timber Creek because it took so much water to go from Garner's ditch down to that point.

I realize that there's a date cutoff on the BLM, but the thing about it is Big Timber Creek had a real high spring flow, and there's still a lot of ground that's capable of being put in desert land entry. If that was cut off after some of them filed desert land entries or something like that, why, I can't visually or financially see where we'd gain anything from having a minimum stream flow in Big Timber Creek because the rights -- it would only be while high water was on anyway if it's set off in the fifties or whatever. After then, why, it would be cut off anyway; so you wouldn't have a minimum stream flow.

THE HEARING OFFICER: Excuse me, Jim. Let me ask if there is anyone else that wants to speak. Keep your place. If not, we'll continue with Jim.

(No response)

THE HEARING OFFICER: Go ahead.

MR. WHITTAKER: Okay. The conclusion, initially a lot of thought and study went into alternative A. At this time it still fills the needs of all interests the best if the BLM would just go ahead and complete the rest of the allotment management plans. Most of the problems listed above are not contained in alternative A and we can afford it.

The BLM will best serve Idaho by continuing to balance the recreational and asthetic values of public land with commodity production. Putting emphasis on recreation and wildlife over commodity production is not in Lemhi County's best interest. Right now everyone in Lemhi County should emphasize creating and preserving jobs, not increasing the federal deficit.

The tourist boom has never materialized. Common sense dictates that more wilderness will not draw any more tourists than we have now. And are our miners, lumberjacks, and livestock men supposed to pump gas for the Canadians and Ohioans? Public lands do not have to be wilderness to be protected.

Let us remember what has made this nation great, private enterprise, not government domination or a public playground. Thank you.

THE HEARING OFFICER: Now, is there anybody that didn't sign up to speak that would like to speak at this time? We've still got plenty of time.

(No response)

THE HEARING OFFICER: If not, I guess we're adjourned.

(Thereupon the proceedings were concluded at 8:20 p.m., November 20, 1985.)

OFFICER'S CERTIFICATE

STATE OF IDAHO)
) SS
County of Bonneville)

I, Rebecca Myers, certified shorthand reporter and notary public, hereby certify that the foregoing transcript, consisting of pages numbered from one to 32, inclusive, is a full, true, and correct transcript and record of the proceeding had at the public hearing of said cause on November 20, 1985.

DATED this 26th day of November, 1985.

(Signed) Rebecca Myers
Rebecca Myers
Certified Shorthand Reporter
Notary Public

(Seal)

My Commission Expires: 3/24/87

H1-1 We are not using a one time inventory to adjust stocking levels, but rather as a warning that stocking levels may be in error. If adjustments are necessary they will be made after monitoring studies are in place. See page 47 of the Draft RMP/EIS and the Implementation section of the Proposed RMP.

H1-2 Big game population goals were identified following consultation with the Idaho Department of Fish and Game. We believe these goals to be reasonable. Wintering conditions during some years may very well contribute to increased use of private land. We would assume that the Idaho Department of Fish and Game would make every effort to reconcile that problem with the landowner. They recently requested that we reduce the deer population goal shown in the Preferred Alternative (F) by 850 animals. Appropriate adjustments in forage reservations and percent increases of deer have subsequently been made.

H1-3 The 3-wire fence noted as the "standard" for the Lemhi Resource Area does not necessarily preclude more substantial (and expensive) fences. It does mean, however, that there must be strong justification for constructing something other than the "standard".

Something over 90 miles of 3-strand fence have been built in the Challis Resource Area since the late '70's. They have proven entirely adequate for containing livestock. We have seen no problems and none have been reported to us by the permittees involved, even though we have solicited comments to that effect from them.

Policy Statement: It shall be standard policy for the Lemhi Resource Area that (1) all wire fences constructed subsequent to this policy statement shall be 3-wire only; (2) wire spacing shall be as follows: Top Wire - shall be set no higher than 38" from ground level; Bottom Wire - shall be smooth and set at a minimum of 18" from ground level; Mid-wire shall be set at 26" from ground level unless (a) bighorn sheep are involved (34"); (b) fence is adjustable for antelope (29").

All new fences shall be flagged (e.g. cloth strips, survey flagging) between every other post.

Exceptions: Variances or exceptions to the above may be allowed in unusual or unique circumstances where public safety is involved or where total exclusion of animals is required (e.g. campgrounds, exclosures, etc.). Exceptions will be justified in writing.

H1-4 Nine acres per AUM was used for analysis purposes. Monitoring studies will determine exact stocking rate on each I-category allotment. Also see Implementation section of the Proposed RMP.

H1-5 The applicability of Larry Bryant's Meadow Creek study to those riparian areas administered by the BLM in Salmon is tenuous. The area within the Meadow Creek study averages 20 inches of precipitation a year compared to an average of 12 to 13 inches in this area. Even in higher precipitation areas, Larry Bryant found that utilization exceeding 70% resulted in degradation to the riparian area. Lou Meyers found no improvement in riparian areas where utilization exceeded 40% in the Dillon, Montana area.

Most riparian areas in the Salmon District are utilized at levels exceeding 70%. Lou Meyers found that short duration, high intensity use of riparian areas during the cool season with utilization levels not exceeding 40% resulted in riparian improvement. Incorporation of proven methods of livestock management such as these into AMPs and Watershed Activity Plans that we develop in cooperation with permittees will be our top priority with respect to riparian management. Total exclusion of grazing in riparian areas will be an alternative used only as a last resort to proper livestock management.

H3-1 The caveat noted at the top of Page C-1 (Draft RMP/EIS) applies well to both big game and livestock. The obvious difficulty in precisely and accurately determining forage demand by either category of animal does not eliminate the need or the value of such calculations for planning and management purposes.

H3-2 See Response H1-3.

COMMENT LETTERS

1

October 1[illegible]

U.S. Dept. of Interior
Lemhi Resourse Land Manager,

Dear Sir;

I have read with interest the Lemhi resourse management p[illegible] and have a few comments on it.

First of all I think it is great that sagebrush burns are being considered for various parts throughout the county. This should have been done more, years ago, but better late than never. Range improvements have been needed to help improve these lands, seeding and etc., to help the impact of our whole area. I think it will help the wildlife as well as the amount of cattle in the long run.

1-1 I am against selling off any BLM lands. Exchange is OK but when they are sold it deprives the generations to come the opportunity to use these areas. I am particularly interested in the Big Springs area by Cottom Lane at Leadore. I know that in the past 5 years it was hunted by numerous people, (if you need some names I can supply them,) from Pocatello to Salmon. The hunting was for deer and antelope mainly. I don't know if anyone taking the game surveys ever stopped to check that this area is a natural crossing for the deer from the Walter and Mill Creek area moving to winter range on the Peterson Creek to Little Eight Mile Area where they winter. So the use for hunting alone in this area during deer season when deer are crossing has quite an impact. If this BLM were sold it would stop all generations from its use. The BLMs desert land entry by Cottom Lane has already started to change deer and antelope movements in this area.

I have lived here all my life, off and on and know these proposals of desert land entry and sell off's are not in the best interest of generations to come.

With this in mind, I am in favor of plan Alternate (B) because it is the least of the two evils of sell off.

Sincerely;

Jim Kluesner

2

United States Department of the Interior

BUREAU OF RECLAMATION
PACIFIC NORTHWEST REGION
FEDERAL BUILDING & U.S. COURTHOUSE
BOX 043-550 WEST FORT STREET
BOISE, IDAHO 83724

IN REPLY REFER TO: PN 150
120.1

OCT 17 1985

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

The Draft Resource Management Plan and Environmental Impact Statement for the Lemhi Resource Area, Idaho, has been reviewed by appropriate personnel within our region, and we have no objections to the contents. Please let us know if we can be of further assistance in the review process.

Sincerely yours,

John R Woodworth

Regional Environmental Officer

3

STATE OF IDAHO

JOHN V. EVANS
GOVERNOR
IDAHO TRANSPORTATION BOARD
CARL C. MOORE — CHAIRMAN
LLOYD F. BARRON — VICE CHAIRMAN
JOHN W. OHMAN — MEMBER
E. DEAN TISDALE
DIRECTOR

TRANSPORTATION DEPARTMENT

DIVISION OF HIGHWAYS

DISTRICT 6 / P.O. BOX 97 / RIGBY, IDAHO 83442
PHONE (208)745-7781

October 25, 1985

District Manager, BLM
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

District Six of the Idaho Diviaion of Highways appreciates thia opportunity to comment on the Draft Lemhi Resource Management Plan and EIS. Our interest lies in the maintenance and periodic upgrading of the State and Federal highway system within the Lemhi Resource Area.

In order for the Division of Highways to carry out their mandated reaponaibilities we require readily accessible and strategically located sources of aggregate and fill materials for present and future projects. The District believes that if the Draft RMP were adopted as ia, our ability to maintain the State and Federal highway aystem in that area would be unduly restricted.

3-1 On Page 4-79 of the DEIS it is atated that the Division of Highways prefers to use several centrally located aggregate sources and then haul material up to 25 miles from those sources. In fact, the State prefers haul distances of less than 12 miles for economic reaaona. We have historically sought and acquired sources that allow the shorteat possible haul distance. This is especially true along U.S. 93 which parallela the Salmon River throughout the Lemhi Resource Area.

Many of our existing mineral material sources are depleted or rapidly being depleted. Two of our existing sources on BLM landa adjacent to the Salmon River have been phyaically reatricted in size becauae of the presence of cultural reaources. If we are prevented from acquiring new mineral material aources on landa administered by the BLM within the river corridor we would have to:

a. Haul material longer diatancea than considered economical, or

b. Acquire new material aources within the river corridor from private landowners or the Idaho Department of State Landa.

SAFE TRANSPORTATION MEANS PROGRESS

EQUAL OPPORTUNITY EMPLOYER

STATE OF IDAHO - TRANSPORTATION DEPARTMENT

Both of these options increase the cost of maintaining the existing road system, which in turn decreases the number of highway miles that can be maintained yearly. For a number of reasons such as public safety, access to recreation and scenic areas, and the transportation of goods, the Division of Highways believe several changes should be made in the proposed RMP.

3-2 1. The Division understands the reasoning and necessity of protecting the scenic and recreational values of the Salmon River Corridor. However, we believe there are some areas within that corridor that can be used as material sources without impacting those values because of the existing vegetative and topographic screening.

3-3 2. The Division has several existing sources within the river corridor (both free use areas and material withdrawals) that are depleted or nearly depleted. We propose that the Division be allowed to expand the size of those sources.

3-4 3. The BLM or Highway Archaeologist should inventory the BLM administered terraces along the Salmon River and determine if there are cultural resources present. If any of the terraces lack cultural resources then they should be considered for mineral material sources.

3-5 4. The District proposes that a 100' to 200' corridor be set aside for highways. This corridor would allow for upgrading, maintenance, and minor realignments of the highway as required.

Thank you again for the opportunity to comment on the draft RMP.

Sincerely,

J.R. DICK, P.E.
District Engineer

5

IDAHO DEPARTMENT OF FISH AND GAME
REGION 6
1515 Lincoln Road
Idaho Falls • Idaho • 83401

November 4, 1985

Mr. Kenneth Walker
District Manager
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

RE: Lemhi Resource Management Plan
1601 (933)

Dear Ken:

Idaho Department of Fish and Game personnel have reviewed the above referenced plan, and a comment sheet is attached.

We appreciate the opportunity to comment on this plan.

Sincerely,

Herbert A. Pollard, II
Regional Supervisor
Region 6

HAP:MR:JD:dk

cc: U.S. Fish and Wildlife Service
Bureau of Program Coordination
Bureau of Fisheries
Mel Reingold

• EQUAL OPPORTUNITY EMPLOYER •

4

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE 83702

November 1, 1985

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

Thank you for sending us a copy of the Lemhi Resource Management Plan and EIS. Our comments concern the management of archaeological and historic properties in the planning unit.

As a general observation the preferred alternative (F) appears to be a reasonable management approach given current funding levels. The standard operating procedures for the protection of archaeological and historic sites are adequate to meet the various federal laws and regulations.

We are pleased to see the commitment to formulate specific cultural resource plans for the Chief Tendoy Cemetery, the Lewis and Clark Trail, and the Salmon River corridor in the preferred alternatives. We are not familiar with "Indian Area A" or "Indian Area B," nor did we find a description of them in the document. If we can be of help in preparing these plans, please let us know.

We want to take issue with the underlying assumption in the sections dealing with cultural resources management that cattle and range improvements adversely effect archaeological and historic properties. Obviously cattle do affect such properties when they are allowed to congregate on sites for long periods of time. However, we believe range improvements designed to disperse cattle across the range and move them away from the immediate area of springs actually reduce impacts to archaeological sites. The Challis range improvements, especially the spring developments, are good examples.

Thank you for allowing us to comment on the plan. If you have any questions concerning our comments, please contact us.

Sincerely,

TJG:rm

THOMAS J. GREEN
State Archaeologist
State Historic Preservation Office

State of Idaho
Department of Fish and Game

COMMENTS - LEMHI RESOURCE MANAGEMENT PLAN

The following comments pertain to the fisheries, riparian and sedimentation aspects of the Lemhi RMP and EIS. The contents include general comments on the overall plan and subjects not covered under the previous three categories. Our preferred alternative recommendation is included in the conclusion along with recommendations to the BLM Preferred Alternative to make it more acceptable.

Our overall impression of the RMP and EIS is that the document was produced in a professional manner, it was brief and to the point, easy to read and understand, and the use of a summary table aided analysis. The realistic approach was refreshing although somewhat depressing. There were, however, several shortcomings that need to be rectified: lack of information on fishery habitat and riparian habitat condition, the failure of addressing the problem of sedimentation and the lack of variation for improving riparian, fishery and sedimentation problems aside from livestock manipulation. There were no goals or standard operating procedures to reduce sedimentation or remove sediment in streams produced by previous management activities. There were no goals or standard operating procedures to improve fisheries in the RMP (page 49).

General Comments

Page 22

5-1 RMP
Under proposed management prescriptions there was no mention of improving riparian habitat nor was there any mention of sedimentation control or improvement of degraded streams. On page 25 you propose (bank) stabilization projects but do not include time tables other than within the 20 year life of the plan. A list of proposed projects, listed by priority, accompanied by estimated completion date would provide a framework to evaluate progress on improvement.

Page 46

5-2 Range
There should be guidelines included in the standard operating procedures requiring all allotment management plans to include time tables for the improvement of riparian and fishery habitat in "unsatisfactory" condition to "good" condition.

Page 49

5-3 Wildlife and Fisheries Program
There was no Fisheries Habitat Program included in the standard operating procedures.

Page 53

5-4 Soils
What are the "tolerable limits" for soil erosion? We would define these limits as "below the level that would be detrimental to fish species plus a buffer zone". An example would be 30% sediment yield is considered the threshold for detrimental effects to emerging fry, we would recommend a sediment yield between 20-25% to provide a buffer zone. Keep in mind that any catastrophic phenomenon could eliminate three age classes of steelhead and two age classes of chinook salmon.

EIS

Page xxii-xxiii

5-5 Table S-1, Watershed and Fisheries, B
The difference between Alternative C and Alternative F, 5,100 acres and 500 acres, respectively, for "acres of riparian area in unsatisfactory condition that would be managed for improvement" seems to be unnecessarily large. Since the main method of riparian improvement will be to livestock manipulations, an additional 500 acres would be more acceptable. The rationale (page D-5) that only 275 acres was all that could be improved in a 20 year period because of planning, studies, etc. seems to be weak. Many studies have already been completed (Platts and Nelson 1985, Plstts and Rinne 1985) on grazing practices to improve riparian and this would substantially decrease the 6-10 years necessary to implement grazing practices to improve riparian habitat. Therefore, it would be possible to increase the number of riparian acres to be improved.

Page 2-51

5-6 Table 2-1, Impacts to Fishery Habitat
The differences between Alternative C and Alternative F related to the miles of stream improvement was not significant as indicated.

Page 2-51

5-7 Table 2-1, Impact to Economic Factors
All alternatives indicate that only minor impacts on income and employment would occur, therefore, all alternatives would be acceptable. This was a very misleading summary. There would be significant economic impacts on the mining, timbering and ranching industries as well as economic impacts on fishery and wildlife values, which appear to not have been considered.

Page 3-17

5-8 Fisheries Habitat
The assumption that "all perennial streams not included in these four categories are considered 'unclassified' and have very few fisheries values" is totally ridiculous. The term "unclassified" means that the stream has not been classified. You even mention two streams, Haynes Creek and McDevitt Creek, that were not classified by the Idaho Department of Fish and Game evaluation study that had fisheries potential and the fisheries habitat was listed as fair (Table 3-3). Any stream that has not been classified should not be "written off" as having few fisheries values. Instead, the fisheries values should be evaluated prior to the implementation of detrimental management activities.

Page 4-49

5-9 There appears to be some information missing from Alternative C, a section on Receipts to State and Local Governments and the Conclusions.

Page B-12

5-10 Alternative B
There was a mathematical correction that needed to be made, AUM's new stocking level should be 1,391 not 1109.59.

Summary and Conclusion

Based on the amount of wildlife and fisheries habitat improvements that would be performed, Alternative C was clearly the best. Alternative F would be more acceptable if the previous suggestions were addressed in the final draft. These suggestions and recommendations are summarized as follows:

1. More riparian habitat acreage included for improvement.
2. A greater emphasis on sediment reduction.
3. More fisheries habitat (instream) improvement, mainly returning spawning habitat to a productive condition.
4. A higher priority for fisheries improvement.
5. Inclusion of guidelines and standard operating procedures requiring AMP's to include plans for upgrading riparian and fishery habitat to the good condition.

References

Platts, W. S. and R. L. Nelson. 1985. Stream habitat and fisheries response to livestock grazing and instream improvement structures, Big Creek, Utah. Journal of Soil and Water Conservation. Volume 40, Number 4.

Platts, W. S. and J. N. Rinne. 1985. Riparian and stream enhancement management and research in the Rocky Mountains. North America Journal of Fisheries Management. 5(2A):115-125.

6

United States Department of Agriculture | Forest Service | Targhee National Forest | P.D. Box 208 St. Anthony, IO 83445

1950

November 7, 1985

Ken Walker
Oiatrict Manager
Bureau of Land Management
Salmon Oietrict Office
P.O. Box 43D
Salmon, ID 83467

Oear Mr. Walker:

The following are Targhee Netionel Forest comments on the Draft Lemhi Resource Management Plan end Environmentel Impact Statement.

1. The Oubois Ranger Oistrict would like to be informed of eny land exchengee or eales of land adjacent to the Netional Foreet.

6-1 2. Range allotments where public land adjoins Netional Forest lend should be examined for opportunities that might increase manegement effectiveness end/or decrease costs to the government. For example, one egency might manage allotmente where both lands ere involved through e grazing agreement.

3. ORV closures on big game rengee appear to be compatible with edjacent Foreet management. However, the Oubois Ranger District would like to be involved as you coneider and prepare closure ordere.

We believe the proposed menagement of public lande adjecent to the National Forest will mesh with the management direction conteined in the Targhee Netional Forest Land and Resource Management Flan.

Thenk you for the opportunity to review and comment on the Draft.

Sincerely,

JOHN E. BURNS
Forest Supervisor

FS-6200 28(7-82)

STATE OF IDAHO

DEPARTMENT OF HEALTH AND WELFARE

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

November 14, 1985

District Manager
Bureau of Land Management
Salmon District Office
P. O. Box 430
Salmon, Idaho 83467

Dear Sir:

The Idaho Air Quality Bureau has reviewed your Draft Resource Management Plan and Environmental Impact Statement for the Lemhi Reaource Area and found it to be incomplete in that major air quality concerns were not addressed. A listing of these concerns follows:

7-1 1. To reflect current Air Quality Bureau regulations, the Plan should state that the Bureau of Land Management will coordinate with the Air Quality Bureau on the davelopment of a Smoke Management Program for Prescribed Burning in Idaho and will abide by the plan when it is implemanted.

7-2 2. The protection of air quality values, including visibility, in nearby Class I areas should be addressed.

7-3 3. The attainment and maintenance of Federal and State ambient air quality standards should be addressed.

7-4 4. The impact of preacribed burning activities on air quality should be addressed.

Thank you for the opportunity to comment on your proposed plan and if you have any questions on our comments please contact me at (208) 334-5362.

Sincerely,

James L. Boylan
Meteorologist
Air Quality Bureau

JLB/hf
cc: Steve Bauer, Water Quality Bureau
File 48.3
COP 1.1 EQUAL OPPORTUNITY EMPLOYER

COOPERATIVE EXTENSION SERVICE

University of Idaho
College of Agriculture
In Cooperation with the U.S. Department of Agriculture

Courthouse
206 Courthouse Drive
Salmon, Idaho 83467
Phone (208) 756-2824

November 27, 1985

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Ken,

The Bureau and the planning team should be congratulated for developing the Lemhi Resource Plan and associated EIS. The document contains a wealth of valuable resource and historical information on the resource area. Methodology used to quantify impacts of proposed alternatives appears to be basically sound; subject, of course, to the errors associated with use of average measures as compared to site specific or localized figures. Few will fault the information presented as fact in the document and , perhaps, excerpts should be reiterated: 1) the affected area contains 88 grazing allotments, only 7 of which are managed under an AMP - p.3-10; 2) of some 407.5 thousand acres of range classified for ecological condition, 269.5 thousand acres was in good to excellent condition or late seral stage and about 138 thousand acres was in poor to fair condition or early and mid seral stages - p.3-11; 3) the apparent trend study conducted with the condition classification indicated that 27% was up, 59% static, and 13% down - p.3-11; 4) "from a historical perspective, general range condition is probably the best it has been in about the last 100 years" - p.3-14; 5) no elk are known to have existed in the resource area at the turn of the century, current population is near 2000 and is at an all-time high - p. 3-15; 6) there are currently about 7400 deer using the area and the population is at a quarter-century high level - p.3-16; 7) antelope population is at about 2800 head and has consistently increased - p. 3-16; 8) private landowner complaints of antelope depredation are increasing - p. 3-16; 9) habitat conditions for bighorn sheep have improved to the point that they have been reintroduced - p. 3-17; 10) in the Lemhi Resource Area, excellent fishing opportunities exist for both resident and anadromous species, although mostly on private lands - p. 3-18; riparian quality throughout the resource area is generally fair to poor and is in a stable or down trend - p. 3-18; 11) 20% of total county income and 40% of total county employment is directly dependent on beef cattle operations - p. 3-35; and 12) small ranches with fewer than 120 cows are more dependent on BLM grazing than are other ranches - p. 3-35.

These facts portray a picture of an area with an economy based on range livestock operations, increasing ungulate wildlife populations, relatively static range ecological condition with a very slow upward trend. That appears to be a fair assessment of the situation. The facts indicate that some livestock distribution problems do exist and that very little has been attempted from the standpoint of grazing management to solve the livestock distribution problems.

The document begins to unravel in the environmental analysis of the alternative management plans presented. Alternative A, the status quo alternative, can be supported by very few. If I read it right, this alternative is the "let's throw up our hands, we are doing the best job we know how, given the money we've got" alternative. The only negative impact is the continued long-term down trend in riparian habitat. The only positive impact is that no additional funds are required. Alternatives B, C, D, and E are so single resource oriented or the ecological impacts presented are so severe that they also cannot be supported. That leaves the preferred alternative - a "multiple-use" proposal.

The primary problem with the preferred alternative is one of values, not resource impacts. Implicit in the plan is the value judgement that increased wildlife populations are preferable to maintaining current domestic livestock production levels. The deer population is to increase 35%, elk 11%, antelope 5%, and bighorn sheep 869% while livestock are to be decreased 20%. The environmental assessment tells me that we can expect a slight improvement in riparian and aquatic habitat with this alternative and that it will only cost us 1.7 million more Federal treasury dollars than Alternative A plus an annual minimum loss to the local
8-1 economy of $193,976 export sales or about $362,735 annually in local economic activity while the plan is being implemented..

Aside from the value judgement favoring wildlife in the preferred alternative, a major fallacy is the assumption that the primary limiting factor for increased ungulate wildlife populations is limited winter range available on public lands. Most of the former winter range for these species, and the only winter range available in severe
8-2 winters has been private land for the past century. The limitation on ungulate wildlife populations is the willingness of private landowners to sustain depredation and the size of winter feeding program proposed by the Idaho Fish and Game Department. Increased deer and elk depredation complaints the past two winters and already this fall would appear to indicate current populations are near the maximum sustainable.

I would propose an additional, more cost effective alternative. Take the lands and wildlife section from Alternative A, the minerals and forest section from alternative G, and write a new range management section. The new range management section would require that a) an AMP would be written on each allotment with the I category allotments receiving first priority; b) about 25 thousand acres of sagebrush would be controlled with prescribed burns or 2,4-D; c) about 4 thousand acres of crested wheatgrass would be seeded focusing on the sites with the highest
8-3 potential production; d) 32 springs would be developed; e) minimum fence and pipeline would be developed to meet the allotment AMP objectives; and f) fences would be modified for wildlife passage only in areas where problems have been demonstrated to occur. This alternative could be implemented immediately with the current management team writing AMP's. Development costs could be held down if the permittees share in construction, seeding, and other development activities. Total development cost with this alternative would be about $.5 million and could be financed out of the current budget. A reasonable goal would be to have all AMP's written within 5 years with implementation initiated on all allotments within 10 years. This time frame would require no additional man-power in the resource area.

This alternative, or something similar, would result in marked improvement in riparian habitat, sustained high levels of wildlife production, and preservation of the range livestock economic base of the county.

Thank you for inviting comment on the document.

Sincerely,

Robert R. Loucks
Lemhi County Agent

9

IDAHO AIR NATIONAL GUARD
124TH TACTICAL RECONNAISSANCE GROUP
BOISE AIR TERMINAL (GOWEN FIELD)
P. O. BOX 45, BOISE, IDAHO 83707

REPLY TO ATTN OF:

Bureau of Land Management

SUBJECT: Lemhi Resources Management Plan - 16DI (933)

TO: District Manager

ACTION

1. The 124th Tactical Reconnaissance Group currently schedules and maintains a Military Training Route (MTR) which overflya the southern portion of the Lemhi Resource Area. This MTR designated IR 3DI/3D7, is used by numerous Air Force, Navy, Marine, National Guard and Reserve Units. Last year 425 missions were conducted in IR 3DI/3D7. The mission totals for 1985 should be even higher. This MTR was established in 1979 and has experienced a continual increase in missions flown since that time.

2. Aircraft utilizing the MTR are authorized to employ terrain following operations from 100 ft. above ground level (AGL) to approximately 7,000 ft. AGL in certain areas. Aircraft speeds very from 300 kts ground speed to 600 kts ground speed depending on aircraft type and specific mission. The objective of these missions is to simulate underflying enemy detection systems in a hostile environment.

3. When MTR's are established, populated areas, low altitude civil air traffic, and noise sensitive areas are considered and avoided to the maximum extent possible. For these reasons many remote, sparsely populated areas controlled by the Department of the Interior become optimum training grounds for high speed, low level flight. The Department of Defense has published written policy concerning flight in these areas. As stated in a circular from the Federal Aviation Administration (AC No. 91-36A) The DOD advises, "military aircraft may at times overfly areas managed by the Department of the Interior at lower than the recommended 2,000 ft. minimum, but in compliance with the minimum safe altitudes prescribed in FAR 91-79. Such deviation will occur only when essential to the mission being conducted". Use of this airspace down to the minimum published altitude at maximum airspeed is essential to the accomplishment of our tactical training mission and is in compliance with FAR 91-79 and DOD Policy.

4. It should be apperent our flight operations will directly impact the recreational qualities of the three special recreation menagement areas described in the preferred alternative F. Of special note is the fact that the entire proposed Eighteenmile Wilderness Area lies beneath the IR 3DI/3D7 corridor. With recreation being recognized as the principle use of these lands, the associated noise complaints that will be generated would eventually reduce the usable airspace and adversely affect the training mission of all involved units.

5. Therefore, the 124TRG strongly advises that military aircraft overflight of the Lemhi Resource Area be considered prior to the establishment of the three SRMAs. In addition there is a direct conflict between the tactical training mission and the wilderness characteristic of solitude. We must object to the proposed establishment of the Eighteenmile Wilderness Area. We cannot subject our airspace to possible reduction due to noise complaints generated by military aircraft performing their mission over newly established recreational areas. Should you have any questions please contact Captain Jay Stevenson, 208-385-5489.

9-1

ROBERT R. CORBELL, II. COLONEL. IDANG
Commander, 124TRG

Cy to: FAA/AFREP
AFRCE WK/ROV
HQ 12AF/DOTX
TAG/ID

10

HEATHER SMITH THOMAS
BOX 215
SALMON, IDAHO 83467
(208) 756-2841

November 26, 1985

District Manager
Salmon District BLM Office
P.O. Box 430
Salmon, Idaho 83467

Dear Ken:

Here are our comments on the draft EIS, which my husband and I read with great concern. As permittees, with our ranching future dependent upon use of the range, your EIS and plans for the range will greatly affect us. We feel that we have worked together with BLM very well during the last 30 years to manage our allotment and we want to continue to work with BLM. We want to cooperate in any way we can to ensure good, healthy rangeland. We care deeply about the land and its future, for it is our future, too, and that of our children. All we're asking is that BLM be accountable and responsive so that we can work together.

The draft EIS is a big disappointment. BLM employees have done a good job in trying to soften the blow when talking individually with frustrated ranchers like us who have been asking questions about the EIS. But if we are to believe their "assurances", then why was the draft EIS written the way it was? Just to satisfy the NRDC court order and the environmentalists who forced it? Regardless of the local repurcussions? Or is BLM being a little two-faced--printing a document like this but trying to tell the ranchers that it doesn't really mean what it says. The document, in all its negativisms against livestock, is what the public reads. If BLM truly wants to work with the ranchers to improve the range, the agency should write a more responsible EIS, and write it in more realistic and less negative terms--instead of this type of arbitrary and anti-livestock document that only serves as a slap in the face to the rancher. It looks like a breach of faith on the part of BLM, and a sell-out to interests who want cows off the range.

We ranchers want to do our part in responsible range management. Yet BLM puts forth this kind of document which alienates the rancher and makes him antagonistic. No matter what you tell us verbally, the EIS stands glaringly for all to see, and we can only assume that this is what the BLM wants the public to read. Therefore we feel we have no choice but to take issue with the parts we feel are unrealistic, unfair, and irresponsible, and to try to explain our reasons for doing so, in hopes of fostering better communication and understanding somewhere on down the line--as we continue to try to work together with BLM as mutual managers of our range. We're not taking issue with the local BLM employees as much as we are with the BLM's goals and actions as an agency. And this is our major frustration; perhaps the agency can not be responsive to the ranchers. Yet still, we must try to communicate.

Best wishes,
Heather Thomas

Comments on the Lemhi Resource Management Plan Draft EIS page 1

The Lemhi Resource Area contains rangeland that has been traditionally used by ranchers as part of their ranching operations ever since those ranches were taken up as homesteads. Due to inadequacies of the homestead laws (none of the Homestead laws really fit the arid West--160 to 320 acres was adequate for farming in humid country, but grossly inadequate for raising livestock on mountain native pasture) livestock operators had to pasture their animals on surrounding public lands in order to have enough land for a viable operation. On many small western ranches, only a portion of the deeded land was farmable--for growing hay and forage crops--and the rancher had to pasture his livestock on public lands in order to get them off his hay meadows to make a crop for winter feed. To have an operation large enough to support a family, the rancher had to have more land than he was able to acquire in his homestead. The inadequacies of the small homesteads can be seen in the great number that "starved out" and sold to a neighbor,or on a sheriff's sale for taxes. Most ranches today are "put together" combinations of several original small homesteads and a "range right".

This is why many ranches today consist of deeded valley bottoms and a nearby range permit--a portion of public land that the rancher has traditionally used as part of his operation. He and his father or predecessor have invested much of their own time, money and effort into making it useful to the operation--putting in fences, water developments, etc. to make it a functional part of the livestock operation. Without that piece of range, the rancher has only half a ranch; he has to have it to stay in business. So what happens to his range is of utmost concern to him.

The present draft EIS is of concern to the 121 ranchers who depend on this rangeland for their livelihoods and way of life. Ever since the Taylor Grazing Act created some much needed order in the use of these ranges (dividing them into allotments, specifying rules for use),

the ranchers have been working together with the government land management agency (now BLM) to improve the allotments, make them more workable, and to ensure a good crop of grass by proper grazing use. Many ranges were overused prior to the 1930's because ranchers had no legal control and most ranges (especially the lower elevations close to the ranches) were used in common by too many people and too many animals--including milk cows and horses, and itinerent owners of sheep. Those overgrazed ranges have made a lot of improvement. Range condition trend since 1934 has definitely been upward, and the range allotments in the Lemhi Resource Area are for the most part in good shape today.

So we ranchers--who have put so much of our lives into improving these ranges, and who depend utterly upon them for our continued existence--read the present draft EIS with disbelief and frustration. The document has several glaring proolems. First of all, it is written with a very negative view of grazing--a bias against livestock on public land--looking at cattle in terms of something damaging to the environment rather than as something beneficial and natural to be managed properly for the good of the land, the rancher, the community and the nation. Secondly, the main thrust and emphasis of the EIS seems to be the enhancement of wildlife habitat and populations, and seems to be written by people who feel wildlife and livestock are basically incompatible, which is untrue. Third, there are some very muddled and inaccurate conclusions concerning ecological situations, impacts on wildlife, soil erosion, riparian areas and other environmental concerns that are supposedly problems on ranges grazed by livestock. Fourth, the economic impacts addressed in the EIS do not seem to adequately reflect the adverse economic impact upon the affected ranchers (and subsequently the community and county) that would occur if these ranchers do have to take the proposed cuts in livestock numbers. Fifth, the means used to determine proper stocking rates and proposed cuts are highly questionable

It is frustrating to the rancher to be confronted with all this--which will so importantly affect his life--and to be given only a few weeks to respond to it, when the BLM took several years to do the EIS. The BLM employees are just doing the EIS as part of their job, and they get paid no matter how it turns out. Most of them will move on to other areas around the country, so it really doesn't matter to them how it turns out. They have no lasting interest in the consequences. They have no personal commitments to these particular pieces of range. They are indifferent to the actual consequences to the land or ranchers. It doesn't matter that a bunch of ranchers' futures are at stake.

If a mistake is made in the calculations, or an estimate is questionable, or a vegetation site is chosen that isn't really representative of the area in question, or a site write-up is in the wrong place (changing the condition class of that area), do they really care? The BLM employee gets paid regardless. He only worries about it if he gets flak from some rancher. But the rancher sees the errors, the soil studies and vegetation write-ups (and the arbitrary formulas that are tied to them) that may affect his whole future--that were done in an afternoon by a temporary employee (who may have been in a hurry, or lost, or unable to cover the whole range), and the rancher is totally frustrated. On the whole, the BLM employees have tried to do a good job, but it's a big job, and they can't begin to know the range like the rancher does. So some sloppiness and mistakes are inevitable in a fast range survey like this one--and therefore some invalid conclusions are bound to be drawn for the EIS. The rancher was hoping for more accuracy.

The BLM has set forth a number of "Alternatives", most of which are not very realistic. Alternative "A"--the existing situation--is probably the most realistic and feasible. Alternative "B" (maximize livestock), seeks to portray a very grim picture of environmental

consequences--in spite of tremendous BLM expenditures for improvements. Alternative "C" (maximize wildlife) cuts livestock numbers ridiculously low; there would be so much grass left over, it would create a fire hazard. Alternative "D" (maximize mineral development) is painted as a doomsday picture for wildlife, watershed and environment. Alternative "E" (maximize timber production) also is seen as gloom and doom for cultural and wilderness values, fisheries, riparian habitat and some species of wildlife--BLM seems to think timber management and elk are incompatible. Alternative "F" is the BLM's chosen alternative and claims to "give no special emphasis to any one resource" and claims to emphasize "balanced multiple use management" based on "a realistic expectation of funding". Yet BLM plans to spend exactly the same for wildlife projects as in alternative "C" (which maximizes wildlife) and plans to increase wildlife populations almost as high as in Alternative "C". Current big game numbers are 7470 deer, 1974 elk, 2799 antelope. Alternative "C" plans for 10,470 deer, 2847 elk and 2950 antelope. The BLM's preferred plan "F" wants 10,118 deer, 2194 elk and 2950 antelope--an increase over today's numbers by about 3000 deer, 200 elk and 150 antelope. It looks like a plan to maximize wildlife even though it claims to be balanced multiple use.

The management costs for all alternatives are high:
Alternative "B"... $2,287,070
Alternative "C"... 1,626,766
Alternative "D"....1,382,340
Alternative "E".... 1,697,477
Alternative "F".....1,721,687. Compare this with the "existing situation--Alternative A--at $146,100.

The chosen Alternative F is the most expensive (except for the unrealistic Alternative B), yet insists on cutting livestock numbers in spite of its costly "range improvements"! In this day of trying to cut taxes and federal spending, to balance the budget, do we really want a more costly and elaborate program when the "existing condition"--

Alternative A--is seemingly adequate (with improving range conditions, not too many restrictions on legitimate multiple uses, an expanding wildlife population, and fairly decent range management)? Can we really afford a more expensive program that is going to impact local users adversely? Cost should have been one of the issues addressed in the EIS, but it was overlooked.

I think it would be a much more responsible action to stick with the "existing situation" which has already given some proven and beneficial results, at much less cost. Let's work on range problems on a case-by-case basis, make improvements where needed, work out conflicts where they occur, instead of trying to implement a costly overall plan which looks suspiciously like a dream plan of the Fish & Game Department, with the ranchers coming out on the short end.

I want to take a closer look at some of these flaws in the EIS. First: The EIS is written with a very negative view of grazing. This bias comes through time and time again. The EIS says that wildlife habitat is "threatened" when used for livestock grazing, and that there are areas of "significant conflict" between livestock and wildlife. Statements to this effect can be found on pages 12, 50, xii, xiii, xiv, xv, 2-19, 2-20, 2-28, 2-38, 2-43, 2-51, 3-16, 3-17, 4-23, 4-24, 4-25, 4-26, 4-39, 4-83, 4-84. Riparian degradation is "due to livestock grazing" and must be managed to minimize livestock use of these areas. A great number of statements assume that riparian areas are "overutilized" by livestock and damaged: statements on page 13, 35, 51, 54, viii, xi, xiii, 1-4, 2-12, 2-19, Impact summary on page 2-51, 3-12, 3-18, 4-7, 4-11, 4-12, 4-27, 4-28, 4-39, 4-42, 4-43, 4-44, 4-54, 4-57, 4-58, 4-59, 4-85, 4-86. Low elevation ranges are "overgrazed" by early spring turnout (page 13, 35, 36, ix, 3-11, 4-8, 4-42, among others). Livestock are supposedly hard on watershed, water quality, forest regeneration

and other environmental concerns (page 13, 46, 2-12, 3-18, 3-19, 3-20, 4-8, 4-26, to name a few).

The EIS is full of statements like these: .."lack of both tree seedling regeneration and establishment of vegetation in general because of livestock use following timber sale harvesting" (page 13). "Range improvements would be designed to enhance, or to have few adverse impacts on, the other resource uses" (page 34). This seems to imply an emphasis on the importance and priority of the "other" uses. Range improvement is thought of in terms of how it can enhance other uses, rather than in terms of how it might benefit grazing.

Under "livestock grazing management", two of the three issues are "How much and where should forage be designated for livestock and wildlife use", and "What special management techniques should be initiated on livestock grazing to improve sensitive areas". The emphasis seems to be on restricting and controlling grazing (to "improve sensitive areas" or to leave forage for wildlife) rather than just on good range management in itself. BLM is assuming that livestock are basically incompatible with wildlife and the health of the environment.

The whole thrust of the portions of the EIS dealing with grazing seem to be to protect other uses from grazing. By contrast, there is never any attempt to protect grazing from possible disruption by other uses. In the BLM's "plan", grazing is the use doing most of the "giving". For instance, restrictions on mining, energy and minerals extraction "are designed to protect wildlife habitat, recreational values, wilderness values and cultural resources" (page 1-2). But not to protect grazing. If grassland or water sources for livestock were affected or cut off by mining or energy development, so what? The same with timber and wood products restrictions. The EIS states (page 1-3) that "efforts to protect recreation and wilderness values and to protect or enhance elk winter range could result in some suitable

forest lands and woodlands being unavailable for harvest." But it doesn't matter if grazing or livestock use patterns of an area are severely disrupted by timber harvest. And under "impacts to livestock grazing" there is no mention of possible adverse impacts from increased recreation, timber harvest, wilderness designation, mineral extraction, etc. Grazing seems to be the barely tolerated "poor relation" among the public land uses, kicked aside whenever anyone can come up with some other use for the land. Livestock grazing seems to have a low priority, as well as being blamed for decline in wildlife habitat, destruction of riparian areas, damage to soil and watershed. If there's any kind of problem out there, livestock must be to blame!

Secondly, BLM's main emphasis in this EIS is on wildlife. The BLM's attitude is perhaps summarized in the statement on page 12: "Hunting and fishing are extremely important to the local economy. Wildlife populations can be threatened when habitat is used for livestock grazing, timber harvesting or other uses."

And on page 35: "The preferred alternative formally recognizes the ecological nonconsumptive and consumptive values associated with viable populations of diverse species of wildlife and their habitat. Supporting that recognition are accomodations for wildlife by other, potentially competing [by whose opinion are they potentially competing?!] resource activities and various habitat improvement efforts. This alternative should provide the enhanced habitat conditions that would make possible population increases for many wildlife species."

The BLM has taken it upon themselves, as their primary goal, to address "the issues of livestock and wildlife forage designations", making sure that livestock don't compete with or damage wildlife habitat. BLM is assuming there is a conflict, and is assuming we should have more wildlife to satisfy Fish and Games' goals--even though we have more game than we need in some areas already. The increasing numbers are making

heavy impacts on private land: elk getting into haystacks, tearing down fences, deer and antelope living in private meadows and alfalfa fields and decimating hay crops, etc. It's not that the BLM habitat is poor, it's because private alfalfa crops are just too darn tempting to wildlife, and fences are no deterrent. The increased game numbers are making an increasingly heavy impact on private land. The Fish and Game has had more requests this fall for panels to keep elk out of haystacks than they have ever had--and they don't have enough panels.

But the point is that BLM seems to think wildlife are more valuable than livestock on public lands, and wants to increase wildlife at the expense of the ranchers--cutting livestock numbers to make room for more wildlife and seeding heedless of the inroads these increased game numbers will be making on private lands. Perhaps their thinking is colored because they feel wildlife interests have more political clout than ranchers.

Thus the BLM, working hand in hand with Fish and Game (big game populations in the preferred alternative were suggested by Fish and Games' own target goals) has slanted the whole EIS with a view to favor wildlife expansion and a reduction in livestock. Fish and Game will be directing it all. BLM is to consult with Fish and Game to determine the extent, location, and timing of all range improvements (page 48) and Fish and Game will be given at least 2 years' notice before any vegetation manipulation project is begun (page 52).

BLM seems to think that in order to increase wildlife, we must reduce livestock. The entire EIS takes the assumption that livestock compete with wildlife and adversely affect wildlife habitat. For example, in Alternative B, it states that the proposed stocking level of livestock would intensify competition with deer, lower the ecological range condition, and probably remove "virtually all herbaceous material prior to deer arriving on their winter ranges". Yet many studies have shown that deer and cattle don't eat the same kinds of plants to any

significant degree, and that deer do very well on grazed ranges. Peak numbers of deer in the West in the 1950's coincided with high numbers of cattle on the ranges. Heavy grazing of grass leads to increase in brushy plants and browse, enhancing deer habitat.

10-1 Page 3-16 claims that "much of the deer winter and spring range is only in fair ecological condition." Is BLM equating ecological condition with habitat condition? I think BLM realizes that "excellent" ecological condition is usually poor habitat for deer and cattle both, since it usually denotes a dense stand of trees. Fair ecological condition (plants in a lower stage of succession) often sports brush and browse plants and is often very good wildlife habitat.

As stated in the EIS, deer winter range in lower elevation country is "almost exclusively a sagebrush community." The EIS claims there is very poor cover here, so winter exposure factors are extremely high. Doesn't the BLM know that deer use heavy sage as cover? They lie down out of the wind in that heavy sage, and are quite protected from weather (and from being seen!).

The EIS goes on to say, "In the absence of a mountain brush zone and very limited forage diversity [is BLM trying to blame cattle for the absence of a mountain brush zone? This country never had a mountain brush zone!] the nutritional level available to deer is probably lower [pure speculation!] than in many other regions. They may therefore be more susceptible to the weakening effects of exposure, resulting in increased mortality and decreased production rates." Then why are they doing so well?

On page 50 it states that range improvements will be designed "to achieve both wildlife and range objectives". Water developments won't be put in for cattle if they might lead to conflicts between wildlife and livestock for vegetation in that area. BLM doesn't want to encourage cattle to use parts of a range that might interfere with wildlife use.

This is evidence again of BLM's assumption that wildlife and livestock are incompatible and that wildlife are more valuable than livestock. Thus BLM is playing favorites and catering to a special interest use. Fish and Game departments make money on a commodity that uses public land (wildlife), selling licenses to hunters. That makes Fish & Game no different--profiting from a consumptive use--than ranchers who graze livestock on public land. Yet Fish and Game is coming out way ahead in this EIS, having a lot more influence and input than the ranchers, and seemingly convincing BLM that we must have more wildlife out there.

Another illustration of this bias is the fact that BLM wants to modify all existing fences (making them only three strand, no higher than 38 inches, with a smooth bottom wire at least 18 inches off the ground), so they'll be no obstacle to wildlife movement--whether or not they can continue to keep livestock in the proper place. It doesn't matter to Fish and Game or BLM that these "corrected" fences will cause a lot of livestock mix-ups, cattle on the wrong ranges, bulls getting into the wrong pastures, livestock out on roads becoming a safety hazard to traffic, and in general create a lot more work and headache for the poor rancher trying to keep track of his livestock. A three strand fence 10-2 with those specifications is about as good as no fence. All through the EIS the BLM mentions that fences will be "corrected", with various amounts of fences corrected with various alternatives. "Though not quantifiable [then why do it?] fewer deaths, fewer injuries, and more efficient range use by big game, are to be expected." Balderdash! There are a lot more antelope and deer killed by coyotes and on the highway than in all the fences put together. Wildlife manage to find ways over or under fences, as evidenced by their many trails through the places that are easy to get through. Good standard cattle fences do not hinder deer, antelope or elk. The ranchers who are "on the ground" (or out in the field, or whatever you want to call it) in more of a position to observe wildlife

movement daily (herds moving in out out of private property, or from one range allotment or pasture to another) can give a better idea of whether or not existing fences are a hazard. In thirty years of observation in our range area, we can recall perhaps 3 animals hung up in a fence, compared with countless deer and antelope kills by coyotes. As a major hazard to wildlife populations, health or movement, the fence is not! Altering fences will only cause a lot more problems with range management, allowing cattle into the wrong pastures (why have crossfences to control grazing use?) and creating problems between range neighbors. Let's keep our fences functional!

I cannot understand the present bias against livestock on public land and the antipathy eminating from environmentalists who feel livestock are damaging. While domestic cattle are somewhat exotic on these ranges, they are not entirely foreign. This valley, like most of the West, supported native bovine grazers, the buffalo. Here in the Pacific Northwest we had mountain buffalo rather than plains buffalo, but they were an important part of this ecosystem until the 1850's. Grazing by bovine animals on these ranges is entirely natural; the vegetation evolved being eaten by a variety of grazers and browsers. Bison in North America go back at least 400,000 years, according to fossil evidence.

Mountain buffalo in our own valley have left recent evidence, with bones and skulls at buffalo jumps (Pratt Creek, bluffs along the Salmon River) where Indians killed them, and horn shells and bones at many other locations. We've found buffalo horn shells here on our ranch.

History gives us lots of documented evidence of native buffalo in this region. In 1824 Alexander Ross led a party of fur trappers through the Big Hole Basin and over Lemhi Pass into Idaho, and up the Salmon River, seeing many buffalo along the way. In one large valley (either the Pahsimeroi, or the Round Valley near Challis), they estimated 10,000 buffalo in one herd. In 1825 Peter Skene Ogden led the Hudson Bay

expedition across Bannock Pass into Idaho and found mountain buffalo by the hundreds, in February. Either they were wintering here in the Lemhi Valley, or trapped by heavy snows, unable to go to southern ranges. The deep snow was a frustration to Ogden who wanted to go south into better beaver country, and in March he sent 6 men on horseback to explore one of the passes to find a way through. They drove about 600 buffalo ahead of them to break trail through the deep snow over the pass.

George E. Shoup, writing memoirs in 1935, told of finding numerous buffalo skulls and bones and mentioned a swamp on his land that was "a virtual burying ground of buffalo". He estimated, from talking with elderly Indians in earlier years, that the last buffalo to occupy this region were here in about the 1830's.

My point is that buffalo grazed these hills, these valleys, these riparian areas. Impacts by large hoofed bovines are completely natural. At times that impact was much greater than that of domestic livestock, for there were more buffalo, in larger herds. They grazed out an area completely (they didn't leave 50 to 60% of the vegetation, as specified by some range manager for protection of range or riparian habitat!) and then moved on.

Grazing is the natural condition for this vegetation, and stimulates it to better growth and vigor. Grass that is never grazed is never as vigorous and its total production is much less. A several-year study at the University of Nevada showed that range plants grazed properly may produce as much as 80% more plant material than plants that are completely protected, and that range plant health is directly related to grazing and browsing stimulation. If grazing were truly damaging to the vegetation, these plants would have been killed out thousands of years ago. The plants adapted to being grazed at some point during the growing season. This doesn't mean they can stand constant year-around grazing, however. Native herbivores moved over the land, eating out

areas and moving on. Under optimum conditions the forage has a chance to regrow.

But the thing to remember is that buffalo held a very important place on our ranges and were crucial to the health of the range. With no grazer, the grass eventually crowds out forbs and many shrubs, and big game habitat suffers; the food for the browser is drastically reduced. Elk are grazers, but they shared this niche with the buffalo and cannot fill it alone; cattle come much closer to simulating the role of the buffalo on our ranges.

With balanced use by grazer and browser, we keep a healthy habitat for both. Livestock are very necessary to the health of wildlife habitat, Fish and Game Department bias notwithstanding. Grazers and browsers complement one another in their food habits, and a good range can support many more total animals this way. Elk eat more grass than do deer or antelope, and compete somewhat with cattle, but tend to use different areas. With their greater mobility they can use "rested" pastures when cattle aren't in them,as well as the higher, steeper slopes. Cattle grazing has been shown to improve elk forage by reducing accumulation of rank, old growth. The resultant new regrowth is more tender, palatable and nutritious for elk. Cattle grazing stimulates some plants to become more bushy, with more volume of regrowth. Grazing greatly improved quality of forage on elk winter range in Oregon in a study done several years ago.

Grazing also improves sage grouse habitat, as shown by several recent studies, including a 2 year study in Nevada (completed in 1983). On mountain meadows, the sage grouse prefer the grazed meadows to ungrazed meadows and streambanks. Grazing stimulates regrowth of forbs used by grouse and maintains them longer; the forbs with regrowth had a higher protein content, lower fiber content, and longer period of leaf succulence, making them more nutritious and attractive to the birds, especially the young ones. Meadows that are not grazed tend to have

tall rank vegetation that is too coarse for the birds. New annual growth is obstructed by the mat of old dead plant material, and the birds have trouble using the new growth.

Nongame species and many birds (including long billed curlew, mountain plover, killdeer, horned lark and others) also benefit from grazing, prefering to nest in grazed areas with maximum visibility. Our livestock are providing a very necessary ecological service. Many species that co-existed with buffalo on prairie and mountain grasslands were dependent upon conditions created by that large herbivore. They might be in serious trouble without domestic livestock to fill that niche and carry out the same role. To assume that we must minimize livestock grazing in order to maximize wildlife is not only grossly unfair to the rancher who has traditionally used these lands with livestock, but also highly inaccurate biologically. The native wildlife have co-existed with a bovine grazer for a long time, and can continue to do so very well.

Thirdly this brings us to some other ecological factors that should be commented upon. The ecological condition rating used to categorize our ranges is confusing and somewhat questionable for the purpose of this EIS. Potential plant communities ("climax plants") are determined by natural factors such as soil type, topography, amount of precipitation, etc. which work together to theoretically create an environment ideal for that particular native plant community. Theoretically, plant succession is a process that takes place in a plant community as one
10-3 group of species replaces another until "climax" vegetation takes over the site. The climax plants are those that can best make use of that particular soil and climate. The usual trend is for small, drought-resistant species (weeds and annuals, desert plants, etc) to give way to larger and less drought-resistant species, for as the soil "matures" and the plant community progresses, it helps create better conditions for larger plants. They shade out the competing short plants, the increased abundance of plants helps hold soil moisture and make it possible

for the less drought-resistant species to get started, and so on.

Soils also supposedly undergo developmental stages as they are broken down by climate and living organisms from the original rock or "parent material". With each phase of soil development, a specific plant development should be found--theoretically--though the actual plants may very because of climate and moisture. The problem with range management ecology is that all too often the range scientist is looking for a mythical climax condition that may never have existed. Some soils in mountain areas are too new. And in most areas of the West, soils are made up of trans-located materials, brought to their present site by wind and water, and are not created from the underlying parent material at all.

Competition among plants is a factor in succession. Trees compete best because they are larger and taller and can shade out other species. But the size and species of tree will depend on climate. Dense, tall forests are climax wherever there is abundant moisture. Sparce, woody shrubs are climax in drier areas.

This "ecological site condition" rating is the method BLM used to judge our range condition. Excellent ecological condition would be 76 to 100% of the kinds and amounts of vegetation supposedly in the "climax" or "potential" plant community. Good condition would have 51 to 75% of these plants, fair would be 26 to 50% and poor would be zero to 25%.

Yet "good" or "excellent" ecological condition may not be good grazing land nor good wildlife habitat. In areas with good soil and moisture, climax (excellent condition) is always trees. As stated in the EIS (page 3-11), "A plant community that is altered by burning, spraying or mechanical treatment may rate as fair in ecological condition [because its climax vegetation has been destroyed and it is working back up toward climax, starting with plants in a lower succession stage], but be in good or even excellent condition for livestock grazing. Therefore, obtaining the potential plant community is not always the management goal for an

area." True. And I might add that climax (excellent ecological condition) IS NOT ALWAYS GOOD WILDLIFE HABITAT, EITHER. So why, then, is BLM trying to improve the ecological site condition on these ranges, seeking to raise the rating of a lot of the "fair" condition range to "good"? It looks like they should be working to improve the range condition or the forage condition, not the ecological condition. As the Director of Idaho Department of Lands stated in his comments on the Challis EIS:

> "Range condition class ratings based on the current stage of ecological plant succession are misleading to most laymen. The ratings of "excellent, good, fair and poor" do not equate to palatability, production or utility, but apply strictly to a specific stage of vegetative composition. Ecologists, especially foresters, range managers and wildlife biologists, have long recognized that stage of ecological plant succession well below the climax level may be most desirable for livestock and wildlife. An example that graphically illustrates such a situation is the Lochsa Elk Range in northern Idaho. Fires eliminated the climax vegetation (white pine and fir). The first stage of secondary plant
> succession (probably "poor" condition class) was the growth of
10-3 shrubs such as willow, red stem ceanothus, alders, etc. This condition class produced some of the finest elk range and elk population dynamics in history. As the browsed shrubs grew higher ("fair to good" condition) and above the reach of elk, big game conditions and populations declined. As the site developed upward toward the climax fir and pine stage ("good to excellent" condition) the situation reached a point where sportsmen, wildlife biologists and even the general public clamoring for controlled burning to recommence the cycle (reduce the range condition class to "poor or fair").

Other examples could be given, but the point is that excellent or even good ecological condition class may be less than desirable for wildlife or livestock on certain sites. Good or excellent condition class does not mean better wildlife habitat, watershed or grazing capacity. The fallacy of the ecological rating system is that it is not a good measure of vegetative cover, soil holding characteristics, or nutritional value to wildlife or livestock. And expert ecologists often disagree as to what the true climax vegetation should be on many sites. There is real question (when even the experts can't agree) if temporary BLM summer employees can truly measure and determine ecological condition classes on these ranges. And even if they could, what use is it in determining whether that particular site is good range for livestock or wildlife?

The frustrating thing is that condition class is being used by BLM as part of the formula in determining proper stocking rates. A range judged to be in good to excellent ecological condition is perhaps not looked upon as needing a cut, compared to a range in "fair" condition. Yet the ecological condition may have little to do with actual grazing capacity or wildlife habitat health. A seeded area, for instance, is no longer native vegetation and can't be listed as good or excellent because it doesn't have enough climax plants. Yet it may be excellent grazing and wildlife habitat. And on the other hand, there are areas in various allotments that should have been listed as "excellent" ecological condition because they are timber--climax plants for that particular site. Yet in some cases BLM put them down as "unmapped". Slightly more than 10% of the grazing land in the Lemhi Resource Area is listed as "unmapped". According to the EIS, unmapped class consists of talus or rock outcrops or "dense timber stands that provide little forage for livestock". That's right. They provide little forage. But they are climax and should have been listed as excellent condition class.

BLM should be more consistent. If they are going to use the ecological condition rating, they should map the timber as excellent. Or, if they are going to throw out the timber and go by forage condition, they should list those seedings and "unnatural areas" and some of the "fair" ranges that are providing a lot of good forage, as excellent. These inconsistencies almost make a person think they are deliberately trying to make those ranges look worse on paper than they actually are (perhaps so they can justify some cuts in livestock numbers?)

"Trend" studies are equally confusing. We ranchers tend to think of "upward trend" as range improvement (better forage plants and more of them), and "downward trend" as range deterioration (less palatable plants, less volume of good forage), but technically that's incorrect. Range trend implies whether the plant community is moving toward climax

(upward) or away from climax (downward). So upward trend in some instances would mean poorer range--invasion of fir trees in a stand of good grass, moving toward dense timber instead of grass, for instance. Let's start using more practical criteria and less confusing terminology!

10-3 BLM out to be using criteria to measure the value of vegetation in terms of healthy habitat and forage plants, not some mythical "climax" vegetation that may be totally different on a dozen different sites on the same allotment due to a variety of soils, precipitation levels, elevation, and whether it's a northern or southern exposure.

Livestock grazing and early spring turn-out have been blamed as the cause for "most of the low-fair and poor condition range" (page 3-11). But much of the low elevation range has less rainfall and part of it consists of poor soil (bentonite) that doesn't grow much. As stated on page 3-19, speaking of the foothills along the Lemhi watershed from Lemhi to Salmon, "even in a natural ecological condition [whatever that is--"natural" should always be thought of as including grazing] these soils are highly erosive and sparsely vegetated." So why blame the livestock?

Page 3-20 contains statements blaming livestock for erosion, saying cattle cause too much soil compaction and decreased infiltration rate (increased runoff) and that these problems are affected significantly by the intensity of the grazing. Yet this depends upon the soil type and other factors. The EIS states that depleted plant cover and trampled soils are the two main factors that contribute to soil erosion of rangelands. Not so. Mother nature (sudden cloudbursts, hailstorms, extremes in weather and climate) does much more to contribute to soil erosion in these young mountains--which are in a geological process of wearing down--than any other factor. Livestock impacts are minor.

Environmental worrierers are telling us that today our watersheds

are being rapidly deteriorated by lumbering, mining and overgrazing and that our runoff, floods, water quality, erosion and siltation are much greater than in pristine times before the white man disrupted things with his treecutting, digging and his livestock. But history and old records prove this false. Flood records on major rivers show that there were serious floods before the white man's disruption of the watershed, and water quality and siltation varied with Mother Nature's whims from time immemorial. The Missouri River was called "the Big Muddy" when the first explorers happened upon it.

Erosion is a normal process and was necessary for life on this planet, changing it from a rocky surface to a predominantly soil-covered surface. It is often difficult to tell the difference between normal geologic erosion and accelerated erosion (caused by disturbance such as overgrazing) because dry regions are often too sparsely vegetated, even in their "best" range condition, to fully hold the soil and protect it from water or wind in a severe storm. Geologic erosion in some areas (even if they are not grazed at all) may be very high. We have to remember that the mountain West is geologically young and that erosion is part of the natural process of wearing down hills and mountains.

Accelerated erosion is due to abnormal soil disturbance (such as jeep tracks, timber activities tearing up the soil surface, overgrazing or anything else that kills out vegetation that might otherwise help hold the soil). Livestock are blamed for soil trampling and compaction which may interfere with absorption of water so that more of it runs off. Some trampling is inevitable and was part of the natural scene long before domestic livestock came along. The buffalo were probably the worst tramplers because they were large and heavy animals and traveled in large herds. The effect of trampling is highly variable and depends a lot on the character of the soil as well as the degree of trampling. Some soils show no change in surface density under heavy trampling, while

others show marked changes. Wet soils seem most susceptible. When soil is not wet, the trampling animals are actually beneficial in loosening the soil surface and in covering any seeds that might have dropped to the ground. Trampling is usually a temporary impact, even on wet compactible soils, because winter frost--which expands and "heaves" the ground surface--loosens the soil again.

Another supposedly detrimental impact of livestock is "damage to riparian habitat". Several places in the EIS are devoted to listing livestock impacts to riparian habitat (such as page 4-86 which discusses BLM's preferred alternative "F"). Riparian habitat, in BLM's opinion, could be improved to "excellent" in areas where livestock are totally excluded. Amount of forage used by livestock was the main factor used for determining riparian condition classification. BLM feels that if more than 50 to 60% of the forage is used, the "productivity and health of riparian areas is greatly reduced." Page D-5 says, "Those riparian areas being fenced will see dramatic improvement within 4 to 6 years. Those areas expected to improve through livestock use adjustments will be much slower to respond." This is very simplistic thinking. Some of the areas with riparian problems aren't affected by livestock. The problem is soil instability and natural erosion, or other factors.

For instance, the terrible destruction of creek bed and bank below the forks of Withington Creek has not been caused by livestock. That area was fine, 15 years ago. Cattle have been basically fenced out of that canyon bottom for 21 years--not to keep them away from the creek, but to keep them away from poisonous plants (tall larkspur, water

10-4 hemlock and cow parsnip) growing along the creek bottom. The horrible erosion (deep channeling, uprooted trees, gravel movement, etc.) started after that, when the Forest Service changed the road--improved it for logging trucks--and put a big culvert in the creek, changing the channel and the thrust and direction of the water. This started the gravel bed

moving, more channel cutting, and subsequent destruction of bed and bank that has now moved on downstream. There is no way the BLM can repair this mess with any kind of "management".

The whole subject of riparian habitat is very controversial and is misunderstood by a lot of people who seem to think streams are delicate parts of the environment and that in pristine conditions they were never trampled nor overgrazed. Untrue. Buffalo had tremendous impact on

10-5 streambanks because they came in such large herds to drink. Early explorers reported huge herds in the river bottoms, and early observations suggest that riparian habitat may have been much more denuded in those times than in recent years--especially in drought years.

But let's look at the problems of today. Several studies have pointed to livestock grazing and trampling as a major impact on streambanks and vegetation, while other studies have shown that livestock impact is negligible compared with natural forces. So the studies don't agree. Perhaps it depends on who is doing the studying and what they are trying to prove, or upon the sites chosen for study. A factor we have to keep in mind is that no two streams are alike and that problems usually have to be looked at on a case-by-case basis; no blanket statement is true for all.

For instance, two studies found that ungrazed portions of a stream had less channel erosion than a portion that was grazed. But another study concluded that during spring runoff, streambank degradation occurs more often and to a greater extent along ungrazed streambank than along a grazed streambank. Undercut banks may not be the healthiest situation for the stream or the land. Spring runoff often takes them, adding more silt all at once than is added during the whole year due to grazing impact. And when some of these undercut banks topple, with the added force of spring runoff, they may take trees with them, or bushes, and impede the channel, causing more cutting and creating new channels--contributing to a

lot more erosion than if the banks had been sloped by cattle walking up and down them, and less vulnerable to severe undercutting.

Most streams in North America have been impacted by ungulates for thousands of years, and some of that impact has been very heavy. Yet the fish survive), the streambank vegetation survived. Mother Nature has been compromising for a long time. Riparian areas can usually withstand overgrazing better than the surrounding arid lands because riparian areas bounce back faster (due to better soils, rapid regrowth potential from more available stored moisture).

Combined effects of geology, soil, climate, vegetation types and water runoff can often result in unstable stream conditions even without livestock grazing, and recognizing what is natural and what isn't can be difficult. Researchers are not in agreement as to what actually happens when grazing occurs and there is still some question as to what constitutes proper use levels. BLM should not be in such a hurry to fence off streambanks or protect these areas by limited use just because some biased studies and reports have claimed livestock create serious impacts. A number of current studies are showing that proper management and season of use can result in good streambank habitat and that there are many ways to use riparian habitat by cattle without damage.

Fourth, let's look at economic factors. The EIS does acknowledge that livestock grazing is important to the county, maintaining most of the current livestock operations (page 34), yet the preferred alternative proposes to cut many permits. BLM tries to assure us that these are only proposals, that they won't be implemented without further study, and that after the cuts are made we would eventually get our numbers back. That sounds good, and we'd like to believe them. But we've been this route before and it's impossible not to be skeptical. The BLM made promises in the past, saying numbers would be restored after range improvements were made. When some of us were cut in 1964, improvements were made, the grass increased, but the livestock numbers were never

restored. Now they propose to cut us again, giving the same old promises. But why cut, when ranges improved after the earlier cuts?

How does a person convince BLM that the range has improved, when they didn't do any monitoring after the last cuts to see how the ranges responded? BLM personel involved in those earlier actions are long gone. And so will these employees be, when further decisions are made. The BLM has no continuity, no consistency, keeps no promises. Other uses come along that have to be considered. Priorities change. Policies and formulas change. The BLM measures grass differently now. That's why the rancher doesn't really trust the BLM and why he's reluctant to agree to a cut. Range managers come and go, while the rancher has to stay on the land, pick up the pieces and try to adjust to each new policy and get along with each new overseer--with no guarantee of tomorrow. A new manager, a new policy, will make it all different. What is assured today is long gone tomorrow. We have no guarantee BLM will give our numbers back if we give them up; they didn't before. Yet we've got to struggle along and try to manage our operations and stay in business.

Under "Economic Conditions" on page 3-30 the EIS states that actual farm income in Lemhi County declined by 15% since 1978 and that after adjusting for inflation, this decline was actually 42%. It's hard to stay in business at that rate, yet BLM proposes to cut most of our allotments!

Pages 3-34 and 3-35 give a description of the livestock industry's contribution to Lemhi County economy (ment animals generate 20% of total county personal income and 40% of total county employment, using multipliers that take into consideration the "ripple effect" of this new income). And page 3-35 states that permit values in the Lemhi RMP are somewhere between $3.6 and $16 million. Yet the EIS blatantly states that Alternative F (BLM's preferred alternative) "would have little economic impact on Lemhi County" though the decrease in capital

value of permits would be "as much as $2.9 million" and most allotments would take a cut in numbers. The EIS looks only at the projected small increase in cattle numbers at the end of the 20 year planning period but says nothing about the devastation that might occur in the interim. If some of the proposed cuts are actually made, some ranchers may go out of business in the interim.

The BLM wants to maximize wildlife numbers. BLM estimates that hunting and fishing at present generate $772,000 in income and 108 jobs in the county (using multipliers, this would be $1.1 million and 157 jobs). But livestock at present bring in more money: $12 million in income, and 1180 jobs. The range ranchers contribute almost 12 times as much to the economy as do the hunters, and ranchers spend this new money locally all year around, supporting all local businesses. Hunters come in only for a couple of months or less in the Fall, and spend money primarily at only a few kinds of stores (gas, groceries, outdoor gear, etc). The Fish and Game Department makes money on the licenses (and this is why they want to expand the game populations) but the total revenue brought in is only a fraction of the value of the livestock on these ranges, and not much of the license revenue is ever seen by the local community.

10-6 The EIS discusses the level of sales generated per AUM (page 4-16) and I assume this means the value of livestock marketed (price received) per AUM. The EIS figure of $21.70 seems a bit low. I'm not sure how they came up with it. A ranch dependent upon public land would not exist as a ranch without that permit. Thus the livestock sold from that ranch--even the part of the herd that may stay home on private pasture--are all tied to that permit. Thus total livestock sales from the ranch are generated by that permit. Any BLM decision that reduces cow numbers on the range--if the reduction jeopardizes the ranchers' ability to continue in business--has a very serious economic impact.

Range use takes a lot of pressure off the very limited amount of

private pasture in this valley available for lease. If the range wasn't available, or numbers were cut too much, or became too high priced for the rancher, he would be looking for private pasture for his cows, and there would be so much competition for this limited forage source that private pasture would become so high priced that even non-range ranchers would be adversely effected. Some of them might go out of business too, if they are dependent upon rented pasture. Any impact on the range rancher is going to have an adverse ripple effect on other portions of agriculture and upon the whole community.

10-7 Fifth, the BLM's means to determine stocking rates are questionable. Page B-11 states that "The majority of allotments did have available forage problems and were in less than satisfactory range condition and trend because of heavy sagebrush density and other factors." How did BLM measure the forage? The vegetation surveys were all done very quickly, all at the same time of year. An inventory like this isn't a very accurate way to judge what these ranges produce. Looking at a range after it has been grazed is like looking at a hayfield after the crop has been taken off--and trying to guess how much tonnage of hay was put up. The actual amount would depend on moisture conditions and other factors. Sure, you can tell a little from the density of the plants, but many other factors enter in. A dry year can make a good range look bad and a wet year can make a poor range look pretty good. The rancher knows more what the range will produce, because he's seen it year after year. He knows whether it provides adequate feed for his cattle or not. He knows if his cattle are coming home fat and the calves bigger every year, or if the range condition is declining and the cattle aren't doing as well as they should.

The BLM is just guessing. They don't have trend plots and haven't done much monitoring, so how could they know? "Less than satisfactory trend because of heavy sagebrush densities.." compared to what? Do

the present BLM employees know what these ranges were like 20 years ago? Thirty years ago? many of our ranges have a lot less sage now than they did earlier. A lot of our ranges were "sheeped out" in the 1920's and 1930's and have come a long way upward since then. And if they are improving, why cut?

Page B-11 goes on to say "After reviewing the proposed increases in wildlife numbers, the range and wildlife staff felt these allotments were not able to provide enough forage for wildlife needs." Thus the proposed wildlife increases seem to be what led to proposed range cuts in livestock numbers--because BLM and Fish & Game feel that wildlife and livestock are competitive and incompatible.

Page B-12 says, "In most cases downward adjustments were based on numbers of acres per AUM, general observations and professional judgment." Perhaps this was influenced by a "professional" bias against livestock and a wish to maximize wildlife? Numbers of acres per AUM is also a questionable factor. Blanket assumptions cannot be made (like using 5 acres or 10 or 15 acres per AUM). How many acres it takes to provide adequate feed for a cow will depend a great deal on many factors--including amount of precipitation, type of soil, elevation, etc. Some of our high elevation ranges with good soil and adequate moisture will produce a lot more feed per acre than low elevation ranges with poor soil and low precipitation. BLM should look more at the vegetation and the shape it's in, how well the livestock are doing, and forget about arbitrary formulas like acres per AUM. Every individual allotment is different.

10-8

The BLM has been doing trend studies on only 8 allotments (out of 88). The BLM cut some allotments in earlier years, but did no follow-up, so there is no documentation of improvements in forage condition. Since BLM doesn't know what the condition was earlier, and can't see the change (because these employees weren't here back then), now they are thinking

"cut" again. This is totally unjustified. Must the ranchers pay for the BLM's unaccountability and inability to do its job? If BLM was going to make cuts they should have done some monitoring to see if the cuts improved the range. Otherwise, why cut? Isn't the purpose of livestock reduction to improve the range? Why do anything only halfway? Is the BLM really interested in range condition and improvement or just interested in taking more cattle off?

On page 47 the EIS states that stocking levels and livestock use adjustments will be determined by mutual agreement or "by decision" if the rancher and BLM can't agree. This the final word is with BLM. So the final word is a decision by BLM, which may be slanted, due to political leanings and commitments; BLM managers may have a personal bias in favor of reducing livestock or they may be pressured to satisfy other interests (wildlife, recreation or environmental interests that want less livestock on public lands) rather than being guided by any real application of range science.

Politics is the moving force behind BLM; there's no way we can get around the fact that the agency is a political entitity--it was conceived, grew up, and continues its existence and derives its sustenence from politics. No matter how conscientious and dedicated the employees (and many of them are), they are caught in a political framework that dictates over-all policy. Politics and priorities change. Thus the BLM as an agency is unaccountable. The rancher then, is left holding the bag. On page 61 the EIS states that decisions in the plan will be tied to the BLM budgeting process, and priorities will be established. But "new policy, departmental guidance, or new BLM goals may influence priorities." How true. That's a way out of any commitment, isn't it?

The rancher's major problem in dealing with BLM is that today the BLM seems to think it more politically expedient to cater to environmental interests. Environmental interests certainly have more clout (more

numbers, more money, media exposure and influence, more favor with court judges!) than do ranchers. Environmental interests are concerned about riparian habitat and feel that cattle damage the watersheds. So BLM immediately gets its act together to respond to this concern, proposing livestock cuts--even before all the facts are in on these controversial issues. Yet BLM hardly listens to the rancher who says the range and the watershed has improved in the last 30 years, or tries to point out that the "erosion" under such concerned consideration is natural erosion. The BLM can't listen to the ranchers, because the agency is caught up in the court-mandated EIS's that have a goal of reducing livestock on public land. The BLM goes through the motions of listening to us ranchers, but it is politically bound in another direction.

It all came about through the BLM's own push for more authority over public land. In the last two decades BLM has sought to intensify its management of public land and to develop a bigger budget and a more powerful agency. Beginning in 1969 the BLM started making a case for greater bureaucratic authority and an expanded program. In 1969 BLM published onto that was critical of the ranchers' past use of the range--and got itself off the hook by claiming its hands were tied by lack of funds and manpower and limited regulatory authority.

In 1957 and 1958 BLM Annual Reports acknowledged extreme drought conditions in those years, and subsequent poor range conditions, but in 1959 and after, the reference to drought was dropped and the poor conditions were blamed on overgrazing. The 1960-1963 Annual Reports called for more BLM management to reverse these "undesirable past trends" and to rehabilitate the range. These calls for more BLM management were repeated through the 1960's and climaxed by the highly critical "Nevada Report" of 1974 which denounced the ranchers' use of the range. The Nevada Report was a BLM "study" showing that BLM was understaffed and the ranges undermanaged. It became the catalyst for action by

environmentalists and others, who used it to point out that BLM admitted it wasn't doing its job. Some people wanted to eliminate grazing entirely, while others wanted to remedy the situation with more expenditure--hire more and better-trained range conservationists, etc. After the publicity of the Nevada Report, other State BLM offices issued studies on their ranges, and these were combined into a range condition report for the Senate Committee on Appropriations.

Partly spurred by BLM's own "advertising efforts" (to make its case for more authority and more budget) in painting a grim picture of the public ranges, public concern began to grow. BLM found itself criticized and condemned by livestockmen and environmentalists alike. In many BLM districts there was a tendency on the part of BLM to do nothing much in the way of improvements unless full-scale rest rotation schemes could be put into practice. Unless funds were available for a "big" project, not much was done. Another problem was that BLM didn't have any basic data upon which to base management plans. Range condition and trend studies hadn't been done since the 1960's. BLM didn't really know what the range condition was, for the ranges hadn't been monitored.

> A report to CEQ in 1977 (Box, Dwyer and Wagner) stated that "It appears that the BLM decided in the 1960's that it was necessary to disassociate itself from grazing to become a multiple use management agency... Instead of broadening its range condition and trend work and expanding carrying capacity studies to include wildlife and recreation, there appears to us to have been a rejection of the basic resource surveys, perhaps because they were "range" studies and these kinds of studies implied grazing as a single use."

In the 1978 Range Condition Report for the Senate, the BLM pointed out that its major problem was lack of funds and personel. The Report was an effective advertising effort on the part of BLM to state its urgent need, and for itself as the highly necessary means by which the range problems could be resolved through more intensive management.

In actuality, the report served more to show how BLM operates than as a new or accurate assessment of range conditions. There were a lot of

indications in various BLM districts that ranges had improved considerably between 1935 and 1961, and there were probably more improvements between 1961 and 1975, yet the figures in the various BLM reports showed no changes in that 15 year period. In their report to CEQ, Box, Dwyer and Wagner stated that it was incredible to them that any ranges could remain "static" for 15 years! The BLM claimed there was "insufficient data" for determining "present conditions". Same old story! The BLM wanted more manpower and funding, and in order to get it they had to show a need for it. Therefore the range had to look bad. The land and the ranchers had become a political football, as always. Adding to the problem was the fact that range management was getting less attention at BLM; the managers were trying to shift their emphasis to other "uses", illustrating the fact that BLM is purely a political entity, motivated by political directions.

But conflicts between BLM and its conservation-environmentalist supporters emerged after 1973 and began to grow, partly because BLM and the environmentalists had somewhat different purposes and the latter sought to control the BLM in their own interests. Environmental groups weren't satisfied with BLM's single EIS (as required by NEPA) for its allotment management plans, and wanted greater emphasis on recreation and wildlife. And the only way they could demand and influence that emphasis was on a case-by-case basis. So NRDC filed suit and won, with the court ordering BLM to prepare 212 (later reduced to 144) EIS's and requiring that alternatives to livestock grazing be documented (so the EIS process has a built-in bias against grazing!)-- the court refereed to BLM's own data on range deterioration as evidence of the need for site-specific EIS's. Thus the BLM's own "advertising" and figures used to further its cause legislatively (to make a case for gaining more authority and budget) backfired and was used against it in the NRDC suit.

Thus the NRDC forced even stricter and more rapid adoption of limits

on grazing (through the EIS process) than even the BLM had desired. BLM wanted more control of the range, but hadn't really wanted to eliminate grazing, since this was still one of its major programs. The AMPs and range improvements were some of the most important tools used by BLM to further its own agency importance and expansion. Immediate and extensive grazing restrictions ordered by the environmentalists through the courts were sure to trigger adverse political reaction from the ranchers, so the BLM chose to lessen this reaction by delaying the livestock reductions and working into the program gradually. It is easier to fight a small piecemeal reaction, region by region, than a large, well-organized and united reaction. By adopting the plans gradually (divide and conquer) the BLM could handle the isolated and individual reactions from the ranchers. This is evident in our own local EIS.

BLM's main goal seems to be to make sure its own authority is firmly established, and it also wants some flexibility in responding to demands of competing user groups--to insure political support for its own programs and to avoid entanglements put upon it by any one group. BLM wanted to weaken the ranchers' rights, but it wasn't quite ready for the clout of the newly strong environmental groups. BLM wanted to make the decisions and settle the conflicts among users, but the legal hassle between BLM and the environmentalists illustrates the tradeoffs faced by administrative agencies that depend upon political influence and have to respond to new or changing political conditions. The environmentalists climbed into the driver's seat and are now making the BLM dance to their own tune, with the court ordered EIS's.

The BLM is gaining more authority and control all right, and the ranchers are losing out. The EIS process provides for public hearings and third party (non permit-holders) input into the development of the grazing plans. These hearings early-on became a forum in which environmental groups could put public pressure on BLM to get the bureau

to respond to their own demands (more wildlife! Less livestock!) So now we're stuck with a costly EIS process in which it is almost guaranteed that livestock will come out on the short end--which is what the environmentalists wanted in the first place. The BLM and the ranchers have become pawns in the power struggle as environmental interests manipulate land management through the courts.

The EIS process discriminates against the rancher. He is the most affected party because if his range is reduced, his whole operation and way of life is in danger. Yet he, perhaps of all special interests, is least able to defend himself or even take the time to read through a lengthy and confusing EIS in the short time he is allowed to do so. He's spending all of his time trying to make a living. His hours aren't 9:00 to 5:00 and he doesn't have weekends off. He doesn't have the leisure time nor the financial resources nor the influence with the media that environmental groups have. And since his occupation is working with land and livestock rather than people, he may not be very eloquent. All too often he is reluctant to speak out because he is self-conscious about his inability to express himself. His livelihood and future is at stake, yet in many instances he is virtually helpless to defend himself. So the environmentalists and wildlife interests, hand in hand with BLM, are running over him roughshod, reducing his permit without any good logic or science to back them up, and he loses out by default. This is not American justice!

I went to take a quick look at the various "alternatives" in this EIS. Alternative "A" is merely the existing situation and livestock are allotted 52,541 AUMs (actual use), even though 62,998 AUMs are still licensed (part of those are in "suspended" form, from previous cuts). BLM assumes there are "deteriorating conditions" at present (page x) but these would be handled on a case-by-case basis. Actually, most ranges have improved in the last several decades, and ranchers who have been

on the land awhile can verify this. But if there are spots of concern, they should certainly be taken care of on a case-by-case basis. Nothing wrong with that. Present game populations (7470 deer, 1974 elk, 2799 antelope and a recently introduced group of bighorn sheep) would continue to use about 8,399 AUMs. Project activity would be limited to maintaining existing habitat. Nothing wrong with that. The game numbers right now are quite high. Deer numbers have increased dramatically in the last ten years, antelope numbers are increasing, and elk populations are expanding and moving into new territory where they haven't existed for at least 150 years. This looks like we must have a healthy habitat for wildlife under the present condition.

This alternative looks the least disruptive to multiple uses including recreation, mining, lumbering and grazing. Range condition is expected to improve (page 4-5), as is riparian habitat. Yet BLM makes the conclusion that "there would be significant negative impacts to range vegetation because of the current amount of unsatisfactory (fair and poor) ecological condition range that would not change." Yet the long-term prediction (on the same page) is for more "good" ecological condition range and less "fair", and there is zero percent "poor" range.

BLM seems to be making a case for their own preferred alternative "F" (in which wildlife is maximized nearly as much as in Alternative "C") by stating that no improvements in wildlife habitat would be made under alternative "A", and habitat quality would remain less than adequate on an estimated 37% of elk winter/spring range, 65% of deer winter/spring range and about 47% of antelope and sage grouse seasonal ranges." If habitat is so poor, then why are these wildlife thriving so well under the existing conditions? BLM also predicts fisheries habitat to decline (tooting their horn for a different alternative) and land sold for private use under the Desert Land Act to suffer soil erosion and stream sedimentation. Does BLM think that private ownership automatically means degradation of

land and more erosion? Then why is private land in so much better shape than public land? This assumption doesn't make sense.

Economically: Alternative A would have the least damaging impact to the county economically, and also be least costly to the American taxpayer. The EIS states that overall, range, soil and watershed conditions would not change. Therefore, if it's not damaging, and it's working, and it's not expensive, why not stick with it?

10-9 Alternative B, which theoretically emphasizes livestock grazing, proposes to provide 61,190 AUMs of livestock forage (less than the licensed AUMs today, but about 8649 more AUMs than in actual use today) which isn't really much of an increase. The long-term stocking level is projected at 70,836 AUMs if range trend and feasibility of range improvements warrant it. "Increase would occur only if funding for improvement projects was available and the projects were completed", says the EIS. That sounds reasonable.

Page xii says, "BLM would strive to maintain or improve existing perennial forage plants, maintain soil stability, stabilize areas currently in downward trend and increase availability of perennial forage plants." Yet on the very next page (xiii) under "Environmental Consequences Summary" it says that "Ecological range condition would decline

10-10 significantly" and that "Wildlife, riparian and fisheries habitat would be significantly degraded. Substantial adverse changes in watershed condition are expected." Why? Isn't this a contradiction from the BLM's stated goals for this alternative? There are contradictions in several places regarding range condition, for alternative B. Why is grazing viewed as damaging? Why does BLM insist on thinking that any increase in livestock would automatically degrade wildlife habitat and cause ecological range condition to decline? Page 4-23 states that "the amount of fair and poor ecological range and unsatisfactory wildlife

* There seems to be a discrepency here. Page 2-10, and the chart on xxii use the 61,190 figure, but page 4-22 says 63,898 AUMs for the short-term stocking rate for Alternative B. Which figure is correct?

habitat should increase substantially under this alternative". BLM feels that more range would be in a downward trend "because the long-term stocking rate is too high." Yet the EIS said increases in stocking levels would only occur if improvement projects were funded and completed! If improvements were made and the forage is there, how can the range decline? The BLM is doggedly making the assumption that livestock numbers should NOT increase.

This is a pessimistic and negative attitude, reflecting a bias against grazing and showing a lack of imagination in range management. Private range and pastureland can withstand these stocking levels and even higher, and support a lot of game animals as well, while continuing to improve. So why can't public range? If it can't, then maybe the reason is that the rancher doesn't have enough individual control of his allotment. He doesn't have enough free rein to manage it properly. Management and improvement is always a site-specific thing. Best results are obtained from locally adapted management to fit conditions on a specific range, giving it the kind of intensive care a private owner would give it.

But to the person who leans toward faith in government control, the answer seems to be in more funding for land management, closer supervision by more and better trained range managers who can monitor the results of "improvement" programs and change the procedures when necessary. This approach is costly and will never be entirely satisfactory because most government land managers do not have the same care and interest in the land that the user does (the land manager rarely even comes out of the office to see the land). The land managers come and go, and have a variety of attitudes about grazing. At best, government management is mediocre management, sometimes good, sometimes bad. No one really cares as much about the "commons" as the private land owner cares about his own land or about land he can be assured he can use and continue to benefit from. Our country really cannot afford the commitment of public funds to try to duplicate what the individual user can do--and what the

individual rancher will do out of his own pocket if he is assured continued use of the land.

Page 4-23 of the EIS cites a number of references supporting the BLM's idea that wildlife habitat would decline with increased livestock use. But this is very negative and unrealistic. Dozens of other references could be given, to quote studies which have proven that proper range management can assure continued health of range condition and wildlife habitat and watershed with optimum use by livestock.

Alternative B proposes game populations of 4800 deer, 900 elk and 2200 antelope (2870 less deer, 1074 less elk and 599 less antelope than presently). Why so few? What are they going to do with the extra? The BLM is implying that livestock and wildlife are incompatible, even though present wildlife numbers have grown steadily in the last decade under present stocking levels. There is no reason that a slight increase in livestock numbers should have to mean such a decrease in wildlife.

Alternative B says, "This alternative would have the most serious vegetation impacts of any alternative considered.. Fisheries habitat in all unclassified streams where grazing was increased could be expected to deteriorate at least one condition class." Alternative B also says the increased livestock numbers might eliminate bighorn sheep. Now that's almost funny. Bighorns aren't even part of the picture yet. A few were just introduced to the area this past January! BLM also predicts that "non forested nongame habitat quality would decline by about 50%." This is pure speculation. This type of negative assumption must have as its basic "ideal" some kind of "pristine" ungrazed environment that never existed in nature.

The EIS contradicts itself. Under Alternative B it states that areas with low rainfall and unsatisfactory watershed condition would be the last to respond to management, "if indeed they did at all. To expect significant improvements in areas in 15 to 20 years with grazing systems

and improvements that are the product of 50 to 75 years of mismanagement always, the previous management is "mismanagement"! in low precipitation zones is unrealistic." Yet on page 2-10 it states as goals for Alternative B, to "maintain and/or improve each range site to its potential... stabilizing areas currently in downward trend" and improve some fair and poor condition range to good condition. And on page 4-43, in glowing terms (speaking of Alternative C--which cuts livestock to a bare minimum of 29,921 AUMs), BLM says "soils would improve, given the limited grazing and the resulting increase in forage production. The 59,399 acres of highly erosive soils would regain sustantial vegetation cover." Soils would improve? Just like that? Just because livestock were reduced? On the one hand, BLM has great optimism (because it's a plan with strict livestock control) while on the other hand, under alternative B, the land may never improve, even with grazing systems and improvements!

Alternative C emphasizes wildlife. BLM would cut livestock to 29,921 AUMs and range improvements would be limited to correcting problem areas. Livestock grazing would be totally excluded on 22 miles of riparian and aquatic areas. Allotment management plans would emphasize management of wildlife habitat rather than livestock grazing. Game populations would be expanded 12% higher than the Fish and Game Department's target goals, and 48,000 acres would be managed just to benefit elk.

At the proposed low livestock level, "no conflicts with other resources" would occur. Yet with only 29,921 AUMs of livestock grazing and 7,722 AUMs for wildlife, that's only a total of 37,643 AUMs (present cattle AUMs are 52,541). Why so low? Why not allow more cows? At this projected low utilization, there will be a lot of forage going to waste each year, creating a serious fire hazard.

There would be a 20% reduction in harvestable timber due to restrictions for elk winter range. Range condition would improve and riparian habitat "would be improved by eliminating livestock use." This alternative

EIS comments
page 38

claims that "60% of unsatisfactory elk and bighorn range would improve to satisfactory", 44% of unsatisfactory deer range and 51% of unsatisfactory nongame habitat would improve. This alternative is the dream child of Fish and Game. "Restrictions on domestic livestock would allow for 90 to 100% of potential elk use to occur on elk winter range." Under economic impact, the EIS states that total sales of livestock would decrease by $490,854. But the actual decrease would be much more than this because a number of ranchers would go out of business, unable to find alternate sources of feed. The BLM has the audacity to say, "this alternative would have little impact on Lemhi County".

Alternative D emphasizes mineral development and would provide 53,603 AUMs for livestock (slightly more than actual use today). The EIS predicts a significant adverse impact on wildlife habitat, soil, watershed, etc. from mining activity, even though "ecological range condition would improve moderately" (page xvii). This doesn't quite make sense.

Alternative E emphasizes forest management. Livestock would have 49,589 AUMs, lower than today's actual use. This stocking level "could be supported in a drought year when forage production was low" (page 2-34). Yet this number of AUMs is higher than the proposed stocking level in BLM's preferred alternative F (43,602 AUMs). Why should livestock numbers be cut? BLM also assumes a decrease in elk population, implying that timber management and elk are incompatible. Yet elk consistently do better in logged-off habitat with regrowth than in old timber stands.

On page 4-71 the EIS states that maximum forest development and management solely for wood products production would be extremely damaging to many species of wildlife and "would put all other plant and animal species at risk. The ecosystem would be inherently less healthy and stable." Impacts on elk "would be immediately obvious and probably long term." Elk are supposed to decrease 40% under this alternative.

EIS comments
page 39

Really? This sounds like an environmentalist's opinion! The BLM is advocating burns to improve habitat for elk, but adamantly opposes timber harvest, which does as much good as a burn but doesn't waste the trees. Timber is climax, but it is not good habitat for game. "Suitability", such as an old-growth timber stand, is not diverse, nor good habitat. There is more diversity in a younger, earlier ecological stage of succession, and wildlife have more feed in the regrowth that comes in after the timber is removed. Elk move into these more open areas after a timber cut or a burn; there is a lot more wildlife feed in the regrowth than in the old timber stands. There are a lot more elk in Withington Creek since the Forest Service timber harvest. No elk stayed on our side of the mountain before. It was winter range but never summer range until the last 8 or 10 years. Now there are elk are year around.

Page 4-70 states that "restrictions on domestic livestock would allow for 73% of potential elk use to occur on elk winter range," implying that livestock grazing is harmful to elk range and should be restricted. But in studies in Oregon, grazing has proved to greatly improve elk winter range.

Alternative F (BLM's chosen alternative) would reduce livestock to 43,602 AUMs (32% reduction from licensed numbers, 19% reduction from actual use figures)--a substantial cut in numbers. The EIS states that "No conflicts with other resources were identified at the proposed stocking level." Thus BLM is making sure livestock won't interfere with any other uses. Game populations would be increased to 10,113 deer, 2,194 elk, 2950 antelope, and 200 bighorns would be introduced. These numbers are much higher than present levels and only slightly lower than Alternative C which maximizes wildlife. Elk are a very recent introduction on many allotments. As stated on page 3-15, "No elk are known to have existed in the resource area at the turn of the century." They originated from transplants between 1910 and 1920 and spillover from Montana. There were no elk here in 1805 either (Lewis and Clark's observations). The current population is probably higher

EIS comments
page 40

than it has been for several hundred years.

It looks like BLM is maximizing wildlife in its preferred alternative. The goal: "Production and use of commodity resources and commercial use authorizations would occur but fragile resources, wildlife habitat, cultural values, and other nonconsumptive resource uses would be protected." It seems like the main thrust is protection of resources to the point of not allowing much use (except hunting?)

Page 4-34 states that this alternative would allow the Department of Fish and Game target populations to be met and would "put habitat integrity on a firmer basis." This alternative almost seems to be written by the Fish and Game Department instead of by BLM. They certainly had a hand in it, much more than the ranchers did. We ranchers didn't even get contacted when vegetation studies and other surveys were done on our own allotments, even though BLM promised us we would be contacted. The ranchers, who are as involved on this land as anyone, who are more vitally affected than anyone else (and therefore most interested in procedures and results) were not even invited to see what was being done, how the surveys were made. BLM didn't want our input, advice or suggestions, even though we know the land, the topography better than anyone else because we've spent our lives out there on it. Instead, the Fish and Game, with their big plans to maximize wildlife (especially big game for hunting) has a free hand, and since Fish and Game has a negative attitude about grazing (feeling that cattle compete with game), this comes through strongly. Limit grazing here, exclude livestock there.

BLM states that some of the areas with unsatisfactory watershed condition are low precipitation areas with a large percentage of bentonite. These factors, more than "mismanagement" are the main reason some of these areas are poor watershed. Yet BLM says that "considering that these areas are the product of over half a century of overuse, any improvement over a 15 to 20 year period is going to be limited." But the worst "overuse"

EIS comments
page 41

took place longer ago than that. The last 50 years had better management than the previous half century. And if the BLM is going to make a statement like "any improvement is going to be limited", then why get carried away with range cuts or livestock exclusions aimed at these areas, if they aren't going to do that much good anyway?

10-11 Page 4-86 says riparian areas are exposed to "stocking rates 5 to 30 times those of adjacent uplands and may provide as much as 80% of all the forage grazed from an allotment." This is a blanket statement, not true for all allotments. BLM should not rely on this kind of generalization but should look at each specific allotment. Every range area is unique and has its own special characteristics and problems. How much a certain stream is used or overused depends on the individual allotment--its physical features and how the ranchers manage their cattle. Some ranchers don't ride much and don't train their cows to use the whole allotment--and the bottoms suffer. Other herds habitually use the steeper slopes to get up out of the hot bottoms and onto the cool breezy ridges away from the flies. It all depends on the cattle and how they are managed and whether they know the range and know how to use it. Riparian problems should always be dealt with on a case by case basis, not with blanket statements that condemn grazing. This only shows ignorance and lack of experience with cattle. Here again, a typical BLM-Fish and Game type of bias.

In alternative F, livestock would be excluded from 15.5 miles of stream. Changes in season of use would be made where there was a conflict with other resource needs." Game habitat would improve. All fences suspected of creating hazard or movement problems for big game would be altered. Funding for alternative F would be an annual cost of $1,721,687, compared with present costs of $146,000.

I feel that BLM should stay with Alternative A (existing situation). It is the least costly, least disruptive of traditional land uses, and

not detrimental to wildlife or environment. As stated on page 4-11 for Alternative A, "overall watershed and soil condition on rangelands would not change." One of the truest statements in the whole EIS is the sentence on page 3-14 which says,"From a historical perspective, general range condition is probably the best it has been in about the last 100 years." I agree.

Let's stick with this type of program. We've made progress, we've got good wildlife populations, and where there are problems we're trying to correct them. Let's continue trying to solve problems on a case-by-case basis (which is the only way they can really be resolved, anyway) rather than try to implement an expensive all-encompasing program that may not really be any better and which looks like it will impact various segments of the public land users (and the entire community) adversely. Let's forget alternative F and stay with the existing situation.

proposals....prohibited areas. What criteria will be used to determine if and how much brush control will be allowed? Sagegrouse, Economics, Resource deterioration?

What percentage of proposed range improvements fall within this 2-mile limit - 20, 30, 40 percent?

11-4 - Page 53, #6. Do you mean complex or do you mean a mixture (if appropriate) that is adaptable, compatible, and meets the objective and addresses the resource concern?

- Page 3-10. 2nd Paragraph, 2nd sentence. Relates to miles of roads per acre of forestland harvested.

11-5 Under the Preferred Alternative, 28,865 acres would be under a commercial timber harvest. We did not see a potential road development scheme for timber harvest, but using the figures in sentence 2, this would come to approximately 209 miles of roads possibly needed to harvest the timber. Perhaps our correlation is wrong; however, our concern is that roads are often major areas of potentially severe erosion resulting in resource deterioration and degradation, i.e. water quality, etc. and these areas need close attention in both design and maintenance to avoid serious damage to the resource. Will new timber roads that are closed be water-barred and seeded?

11-6 - Page 4-103. Livestock Grazing. Statements are made throughout the document that livestock would be excluded from (?) acreage of riparian areas. If this exclusion is permanent, would this not be an irreriev-able loss of forage to the livestock and perhaps an irretrievable loss of income to the operator?

- Page B-7. Classification. Your description of the SCS's range site classification system is somewhat confusing and could be misleading. SCS's definition (National Range Handbook, Section 302.1) of a range site is as follows: A range site is a distinctive kind of rangeland that differs from other kinds of rangeland in its ability to produce a characteristic natural plant community. It is capable of supporting a native plant community typified by an association of species that differs from that of other range sites in the kind or proportion, of species or in total production. Differences in kind, proportion and in production of plants are in large measure the result of differences in soil, topography, climate and other environmental factors. However, variations in these factors are not criteria for site differentiation.

Range sites are the basic component of rangeland inventories. They are ecological subdivisions into which rangeland is divided for study, evaluation and management.

11

United States Department of Agriculture
Soil Conservation Service
Room 345, 304 North 8th Street
Boise, Idaho 83702

December 10, 1985

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

Thank you for the opportunity to review and comment on the "draft" Lemhi Resource Management Plan and Environmental Impact Statement. We have the following comments:

- We appreciate the length of time given (90 days plus) for review of the document.

11-1 - Page 24, Watershed Management. Statement made to fence 15.5 miles of stream. Would the fenced areas be large enough to be part of a grazing system, i.e. time-controlled grazing of livestock, or would livestock be permanently excluded? We realize that all riparian systems are unique and need to be evaluated accordingly; however we generally believe and most studies are indicating, that complete livestock exclusion is not necessary for most riparian systems to show improvement. Even when fences are used to better control time of livestock use on riparian areas, these need to be strategically placed so as not to create livestock bottlenecks, unnecessary trailing, and areas of resource degradation. These just move the problem.

Fencing small areas often causes unnecessary friction between the user and agency through accidental fence breakage, which may or may not be either parties' negligence.

11-2 - Page 52 Fencing. The first paragraph appears to be a little confusing. Do you want the fences to be visible to people, livestock, wildlife or what?

Also, from the livestock "pounds of gain" standpoint and good range resource management, we often build the fence in the wrong location, i.e., ease of maintenance, etc. from a human standpoint. Most fences should be placed such that livestock movement is not channeled, movement is generally unhindered and leaves fewer areas for serious degradation of the resource from forced livestock trailing, use, etc.

11-3 - Page 52. Vegetation Manipulation. This section appears to have many restrictions placed upon any kind of range improvement - irregardless of range ecological condition or resource concern, i.e. 4. Brush control

11-7 - Page B.8. Ecological Condition. If you arrived at ecological condition using all of the condition indicators listed on Form ID-4400-1, page B-9, you cannot refer to SCS methods in arriving at ecological conditions. Neither does SCS in Idaho nor does SCS in the National Range Handbook, July 1976, give guidance on using indicators such as "Current Erosion," "Stand for Site," or "Preferred Species Present," in calculating ecological condition on rangeland.

11-8 - First page, 3rd sentance. This sentence refers to SCS's Range Site Descriptions. Beginning in 1979, all site descriptions developed for your area were titled RLts-SCS or INTERA with considerable input from BLM personnel. This needs to be recognized in your statement.

- Page B.8, B.9. Projecting Ecological Condition and Trend.

11-9 - Page B.9. We have some concern with your terminology of "disturbed" when you change from ecological condition to an area of seeded range. For instance, the SCS National Range Handbook, Section 305.9 (b) addresses areas of rangeland that are seeded to native or adapted species are to be delineated.... and labeled "seeded." The names of principal seeded species and an indication of the stand or ground cover can also be shown.

Addressing these seeded areas in this manner would appear to us to give a more meaningful inventory interpretation as well as a more meaningful base from which resource planning could begin.

11-10 - Page B.27. Table B-4. Within this table at various locations, the Problem/Conflicts, Objectives, and Management Alternatives columns refer to noxious weeds. The objective is to "control of spread of noxious weed." It would seem that "there is a noxious weed occurring" is the problem and that control of the noxious weed should be the objective rather than only control of its spread. This kind of an objective would seem to more closely align with your statement on noxious weeds on page 17 of this document.

James N. Hobson
Stanley N. Hobson
State Conservationist

12

Alice I. Frell
Lands Director

Rocky Mountain Oil & Gas Association, Inc.

345 PETROLEUM BUILDING • DENVER, COLORADO 80202
303/534-8261

December 18, 1985

Mr. Jerry Wilfong
Lemhi Resource Area Manager
Bureau of Land Management
P. O. Box 430
Salmon, ID 83467

Dear Mr. Wilfong:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I would like to offer our comments on the proposed Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) for the Lemhi Resource Area in Idaho. RMOGA is a trade association representing hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. As a result of this, our members have a vital interest in how the BLM manages its lands, particularly with respect to mineral resource activities.

We are concerned that energy and mineral resources have not received adequate consideration in the planning process for the Lemhi RMP. The exploration for and production of energy resources should be provided for in this plan by opening or maintaining access to areas which may contain these resources. Areas identified as having energy and mineral potential should influence other resource decisions. Access to these areas should be limited only by the minimum legal standards established for environmental protection. In areas where conflicting resource values may outweigh mineral values, the BLM should identify what minimum environmental protection is necessary to meet the plan objective for these resources.

12-1 On Page 4-78 of the DEIS, Environmental Consequences, the BLM indicates that Preferred Alternative F would result in a 20.4% decrease in lands available for oil and gas leasing with standard stipulations, a decrease of 7.4% in lands with seasonal occupancy restrictions, and an increase of 141% in lands with a no surface occupancy (NSO) stipulation. Such changes are extreme in light of the fact that the BLM has also chosen to recommend designation of wilderness in an area considered to have oil and gas potential. Given that the Lemhi RA generally experiences high potential for oil and gas, we question the rationale for such an increase in surface restrictions. The Preferred Alternative does not appear to have taken this potential into consideration. In fact, Alternative F is one of the most restrictive in terms of mineral access. Even though the BLM

states on Page 43 of the plan, Operating Procedures, that the authorized official may waive certain conditions should the situation warrant it, once a stipulation is in place it will be difficult to change.

The BLM further states that actually only 12,720 acres will be inaccessible to oil and gas exploration and production because companies can directionally drill the remaining acreage. This estimation is based upon current technology. While the current technology may allow for directional drilling in some cases, the BLM cannot have actually considered the substantial increases in cost nor the increased technical problems associated with directional drilling. There are no guarantees that a well drilled under normal circumstances will be successful, but the chances are significantly less when directional drilling is involved. Directional drilling is not the panacea many seem to think it is.

12-2 While we appreciate that the BLM has been specific in terms of restrictions and their associated impacts on oil and gas exploration and production activities, the documents lack specificity as to the rationale for these decisions. There is no evidence that the BLM has done a tradeoff analysis between surface and subsurface resources. When comparing the geologic potential and Alternative F maps, it is obvious that most of the NSO areas are located in areas considered valuable for oil and gas resources. But has the BLM considered the loss to local, state and national economies which will result from such severe restrictions on oil and gas activities? Industry has proven time and time again that its operations are compatible with sensitive resource values. There are many widely used methods available to mitigate adverse impacts to sensitive resources other than a no surface occupancy stipulation. It is interesting to note that timber access and cutting do not appear to be as restricted as oil and gas activities,yet timber activities generally have a more significant environmental impact.

In conclusion, it is our recommendation that the BLM modify the proposed action to include more of the goals in Alternative D, the Mineral Development Alternative. This would result in a more balanced, multiple-use-oriented resource management plan. While we would like to see Alternative D selected as the preferred alternative, we realize that it is not realistic. However, we believe that a combination of Alternatives D and F would provide a more equitable mix of resource goals and objectives.

12-3 Further, we believe it is essential for the BLM to calculate the lost or gained revenues which would result if the Preferred Alternative is adopted. By revenues, we mean filing fees, lease rentals and bonuses for unleased lands and

leased lands not currently producing. If production is occurring the BLM should also include royalties and taxes which represent a return to local, state and federal governments. Additionally, this information should be provided for each of the management alternatives, thereby affording the public the opportunity to more fully evaluate the Bureau's alternatives and decisions.

Should you have any questions regarding our comments, please feel free to contact me. RMOGA would be happy to discuss these comments in further detail.

Sincerely,

Alice I. Frell
Public Lands Director

AIF:cw

13

Continental Divide Trail Society

P.O. BOX 30002 BETHESDA, MD. 20814

December 26, 1985

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

Thank you for inviting us to review and comment on the Draft Resource Management Plan and Environmental Impact Statement for the Lemhi Resource Area - 1601(933). Our review relates solely to matters affecting the Continental Divide National Scenic Trail.

We are pleased that the CDNST is recognized as a Special Recreation Management Area and that the LRMP addresses management practices applicable to the Trail corridor. We concur with the need to write a recreation area management plan for the SRMA, as stated at page 2-44 of the EIS. We also agree with your emphasis upon visual quality goals for the SRMA.

13-1 The difficulty we have with the Plan is that it seems to assume that the location of the CDNST has already been selected. It has not. On the contrary, the comprehensive plan for the Trail must be issued by the Secretary of Agriculture and then the criteria must be applied, after consultation with interested parties, before any such a route selection decision can be made.

It is thus premature to identify the CDNST corridor. Notwithstanding this fact, we consider it entirely in order (1) to identify areas which BLM regards as likely locations for the Trail and (2) to apply appropriate interim management measures to assure that the qualities of those areas is protected until a formal designation of the route is made.

Accordingly, our first recommendation is that any references in the RMP to particular settings for the CDNST (especially the maps) should reflect the tentative nature of the route identification.

Our second recommendation is that the RMP clearly state that the formal designation will be preceded by a process, involving public participation, to select a route and prepare a recreation management area plan in accordance with the CDNST comprehensive management plan. Specific practices proposed in the present document should be reviewed on that occasion to assure compatibility with the comprehensive plan.

Turning to the map of the Preferred Alternative, let me comment in turn about each section proposed for management as part of the CDT SRMA.

T22N R3E. There is no good reason for this to be part of the SRMA, even on an interim basis. We don't envisage a route along the crest at this point. The Montana side seems much more likely. On the other hand, we have no objection to including it, on an interim basis, in a SRMA.

T18&19N R3E. The CDT quite obviously will hug the crest throughout this stretch. For interim purposes, the SRMA indicated on the map is acceptable. When the recreation area management plan is prepared, however, minor adjustment should be made to provide corridor protection on both sides of the actual treadway. See the 1980 Management Option Plan, Map 4, for details. (Why doesn't the hatching extend all the way to the south border of the township?)

T17N R2E. The same comment applies here. The SRMA is ok for interim purposes, but the Trail might better be moved down to the side of Whiskey Spring Creek when the RAMP is prepared, in which case the SRMA boundary would need to be adjusted. 12-2

T14N R3E. Again, there is no objection to including this tentatively in the SRMA. We anticipate, however, that option D2 (map 11 in the 1980 MOP) is less likely to be selected than route A-B4, which lies in Montana.

T13&14N R3E. The indicated SRMA reflects the location of route D2 of the 1980 MOP. As noted in our letter of August 30, 1983, we think route B4 may well prove to be a better choice over the long run, although it might require some new construction around the south side of Eighteenmile Peak. The pros and cons of all the alternatives can be weighed when the RAMP is developed. For interim purposes, however, we have no objection to showing the SRMA along the crest, provided that the Eighteenmile WSA is managed as wilderness. In any case, we question the following statement, at page G-13: "It is doubtful that the trail location would be in the WSA since an existing trail system exists nearby in Montana." We will keep an open mind on the subject and ask only that you do the same. A decision should be arrived at carefully, taking into account the factors identified in the comprehensive management plan.

For further information, we refer you to our publication, Guide to the Continental Divide Trail, v.2: Southern Montana and Idaho, which provides a detailed description of parts of the route.

One specific management detail should be brought to your attention, though perhaps it should be dealt with in the context of the RAMP rather than here. Specifically, it would be desirable for the spring at the southern boundary of Section 24 of T17N R27E to be improved so as to provide a better water supply for stock and Trail users alike.

Please let us know if you wish any further information about the above.

Sincerely,

James R. Wolf
Director

14

SALMON SCHOOLS

OFFICE OF THE SUPERINTENDENT
DISTRICT NO. 291
P.O. BOX 790
SALMON, IDAHO 83467
208-756-4271
SPECIAL SERVICES
208-756-4553

15

JAMES A. SMITH, Superintendent

January 2, 1986

Mr. Ken Walker, District Manager
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Dear Ken:

In response to your team's Lemhi Resource Plan and Associated EIS I would like to commend you for the work being completed and also submit comments.

As you are well aware, the economic base of the Salmon community hinges on several factors and no one factor alone will maintain or carry the county. Currently agriculture is one of our primary solid stable economic bases. The indication that there would be approximately a 20% decrease in grazing rights concerns me, especially when it is coupled with a significant increase in deer, elk and big horn sheep numbers.

I have always advocated and supported the multiple use concept over any single resource concept as are some of the other proposals; specific Alternatives B, C, D and E. Of course, Alternative A would be a hard one to support.

I would encourage the BLM to develop a multiple use concept that would also hold the livestock levels and the wildlife levels in a balance to develop some plan for improving the range via continued grazing allotments, watering and rotation grazing patterns as has been practiced in the past.

I thank you for this opportunity to respond and thank you for the good data that was available in that document and continue to encourage you to consider the economic base as well as a recreational potential for the Salmon Valley.

Sincerely,

James A. Smith
Superintendent

JAS/kc

ON THE "RIVER OF NO RETURN"

16

United States Department of the Interior

BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

December 31, 1985

Memorandum

To: District Manager, Salmon District Office, Bureau of Land Management, Salmon, Idaho

From: Supervisor, Minerals Involvement Section, Branch of Engineering Studies

Subject: Draft Resource Management Plan and Environmental Impact Statement for the Lemhi Resource Area in Eastern Idaho

With regard to minerals, the Lemhi Resource Management Plan and Environmental Impact Statement is a good document. However, there are a few deficiencies which, when corrected, will improve it substantially. They are:

1. Although the document contains a map showing the mineral potential of lands in question, it would be greatly improved if overlays of withdrawals under each alternative were available. This would allow the reader to easily view the withdrawal and the mineral potential of the lands which are being withdrawn. In addition to this, a summary table which correlates mineral potential and withdrawals would also be welcome. 14-1

2. Mangement restrictions are acknowledged to exist, but details are lacking. A section on management restrictions, what they are (in detail), and how they will affect minerals and mineral development would also aid the document. In addition to this, the management restrictions and their effects on minerals should be examined under each of the alternatives. 14-2

Should these changes be made, this document would then become one of the best we have reviewed this year. Thank you for the opportunity to review it.

D'Arcy P. Banister

708 Lombard Street
Salmon, Idaho 83467

January 5, 1986

Mr. Ken Walker, District Manager
Bureau of Land Management
Salmon District Office
P. O. Box 430
Salmon, Idaho 83467

Dear Ken,

I have thoroughly reviewed the Draft Lemhi Resource Management Plan and Environmental Impact Statement, and wish to offer the following comments and suggestions regarding these documents.

TIMBER MANAGEMENT

You repeatedly refer to "commercial forest land" throughout the document, but fail to show where this is located. I would like to see a map of what you consider to be CFL on the Salmon District. I would also like to see a map of what you plan to road and log during the life of this Plan. It is impossible to predict impacts without knowing where these timber sales are located. 16-1

On these commercial forest lands, you refer to terms such as "intensively manage", "special management to protect critical elk winter range", and "restricted management". What do these phrases mean? They are not defined in your glossary. 16-2

The calculation of your sustained yield allowable cut is somewhat vague. Table S-1 (p. xxii) shows varying amounts of CFL and woodland, yet the allowable cut is identical for each alternative (1.07 MMBF). Shouldn't the allowable cut vary by alternatives when you have different amounts of land base? Table 2-1 (2-50) shows that there will be varying losses of available timber as reflections of the restrictions placed on each alternative. Why can't these figures be combined to show the actual outputs in Table 2-1? 16-3

On page 4-80 it says, "This harvest level must be maintained through FY 1988, when a new 10-year allowable cut will be computed." Why? It would seem that a new allowable cut could be implemented as soon as this Plan becomes final!

On page 33 it says, "This alternative designated the commercial forest lands available for intensive management and provides for the planning area to meet its present sustained yield allowable cut." This statement makes it

sounds like you already have a predetermined goal that you have to meet. Your allowable cut should be determined by what the land can support, not something that was dictated to you by someone in Washington, D. C.

In general, you place far too much emphasis on timber management on very marginal timber producing areas which are also highly productive wildlife areas. Timber cutting has significantly degraded high value areas such as McDevitt Creek and Agency Creek. I question the advisability of any additional cutting in either of these drainages unless you can clearly show benefits to wildlife.

ROAD MANAGEMENT

I am disappointed in the fact that you have completely ignored the management of roads. I found no mention of any road-related problems in the Issues and Concerns. It is hard to believe that you do not recognize the wildlife problems relating to poaching and harassment resulting from roads.

16-4 There are hundreds of miles of roads (both constructed and jeep trails) now existing on the Lemhi Resource Area where these problems exist. Many roads are surplus and no longer serve a particular need. I suggest that you analyze your road situation and close as many as possible in the significant wildlife and watershed areas.

Your proposed management of off-road vehicles is not much better, with only 7 % of the District closed to ORV's. I wish you would reconsider this decision. There are
16-5 thousands of acres of high value wildlife habitat in the Lemhi River valley that could benefit by ORV closures during the summer months.

RANGE MANAGEMENT

I do commend you on your efforts to recognize and correct the many overgrazing problems in the Lemhi River valley, with emphasis on riparian habitat. However, I do not feel that your Preferred Alternative F goes far enough in the right direction toward correcting the majority of the problems. This is especially important in lieu of the fact that the "BLM must also ensure the preservation and enhancement of 'the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological changes.'" (p. 13).

I suggest that you completely rehabilitate the majority if not all of the degraded riparian areas as proposed in
16-6 Alternative C and make "substantial improvement" to riparian habitat, rather than "slight improvement" as indicated for Alternative F (p. 2-51). This would appear to comply most

closely with the BLM management direction statement above.

WILDLIFE MANAGEMENT

You say that the primary wildlife objective of Alternative F "would be to provide a balanced and reasonable approach to wildlife habitat for the resource area." (p. 2-42). I agree with the philosophy, but with the large amount of wildlife habitat degradation occurring on the Lemhi Resour Area in the recent past due to logging, grazing and mining, I feel you should go a step further. The Resource Area is an important wildlife habitat area for big game, game birds, non-game, and fish (both resident and anadromous), therefore I would like to see considerably more emphasis placed on this important resource.

Under Alternative C, "wildlife habitat protection and enhancement would be one of the primary goals for the resource area. The emphasis would be on habitat protection, particularly from a minerals, livestock, and forestry restriction standpoint." (p. 2-20). This may appear to tip the balance atrongly toward the environmental side, but in reality only brings it toward a mid-point. The public has gotten used to and in many cases has accepted poor grazing and timber practices on BLM lands. It is time that this aerious imbalance in resource uses is corrected.

TRESPASS

On page 18, you say that "Resolution of trespass land use involves an administrative decision, adequate funding, and commitment of manpower." This is very vague, especially
16-7 the part about an administrative decision. Please explain this statement. It would seem to me that correcting trespass should be one of your highest priority jobs. This sounds like you are trying to avoid the issue.

MY PREFERRED ATERNATIVE

I have stated many reasons why I can not support Preferred Alternative F. To summarize, this alternative places far too much emphasis on commodity resources - timber, range and minerals at the expense of non-commodity resources - fish and wildlife, watershed and outdoor recreation. I feel you should revise your priorities for the Lemhi Resource Area.

To do so, I suggest you select an alternative that best protects non-commodity resource values. Alternative C is the one that best fills these needs. It provides the most forage for wildlife species, the most big game cover, the most improvement of riparian habitat, the most improvement of fish habitat, the most Semi-primitive Non-motorized recreation, the most wilderness, the most emphasis to recreation in

general and the most protection of cultural resources; yet still maintains a viable livestock industry in the valley and a small allowable cut of timber. This is the way I envision the majority of Idahoans would like to see Lemhi County managed.

Please consider these suggestions as you revise the Draft Lemhi RMP and EIS.

Sincerely,

Hadley B. Roberts

HADLEY B. ROBERTS
Certified Wildlife Biologist
U. S. Forest Service (Retired)

17

Bob Charles Mgn.
Muleshoe Ranch
Tendoy, Idaho.83468

Jerry Wilfong
Lemhi Resource Mgn.
Bureau of Land Mgn.
Salmon District Office
Salmon, Idaho 83467

Jan.4, 1986

Oear Jerry;

This letter is to confirm the comments I made about the enviromental impact statement and Lemhi resource management plan while visiting you in your office on Oecember 18, 1985.

As stated before I feel this stsement is slanted to fsvor Wildlife, to the detriment of livestock grazing in the Lemhi Valley.

I have serious doubts as to the validity of some of the information that is contained in the drsft. A case in point being the number of AUM's credited to the Muleshoe Ranch's 5 year grazing record in the Warm Springs allotment. The draft states the Muleshoe Ranch has only used 1169
17-1 AUM's per year in Warm Springs the last 5 years. This amounts to 260 cows and calves for 4½ months. Our permit grants us grazing for 550 pairs or 2250 AUM's per year. While we have at times not used the full 2250 AUM's during the last 5 years, my records shows that we have certainly used more than 1169 AUM's per year.

All of the alternstives listed in the draft except 8 would cut our grazing permit drastically, with alternative C affecting us the greatest. Even alternative A the "no action" alternative shows the Muleshoe Ranch taking a reduction of 48% in the Warm Spring area.

This kind of negative information if brought into effect will have a serious impact on the Muleshoe Ranch's ability to function as a visble commercial cow ranch. Economically speaking a 48% "cut"in Warm Springs would reduce our income approximately $80,000.00.

We feel very certain that our neighbors feel the same way about this statement. We all want to cooperate with the BLM to improve our rangelands here in the west but feel "threstened" because every alternative but one gives the BLM the right to cut our grazing permits.

For these reasons, the Muleshoe Ranch can only reccommend the one alternative that will let us continue in business and that is alternative B the "Livestock" alternative.

Sincerely

Bob Charles Mgr.

Bob Charles
Muleshoe ranch
Fenley, Idaho

Jan. 5,1985 **19**

To BLM Manager, Salmon District Office,
I am writing to provide comment on the proposed management plan for the Salmon BLM Lemhi Resource Area. I strongly urge that the plan be adopted, including significant decrease in cattle grazing, along with a minimum of at least the doubling the fes now paid per AUM. Since it is common practice among stockmen to graze more animals than they are allowed legally by their lease, then they should pay for it. A saying among livestock operators is that cattle do not destroy riparian environments, this is a blatant lie, cattle do destroy streamside vegetation, they do pollute the water with their waste and if a ranchers stock causes this damage, the rancher should be held liable for civic damages to the land. More grazing rights should be allocated to wildlife, and not to the profit of a rancher. The amount of land being considered for wilderness designation is avery good part of the plan and this should remain totally in effect.
In summary, no rancher either sheep or cattle should be given a free ride at the expense of the taxpayer, by the subsidies of the taxpayers on AUMs and BLM advisory committees should not be stacked with stockmen when it comes to allocating grazing allottments between cattle and wildlife.

Thank You
Travis Whitaker
420 Holbrook
Idaho Falls, Id.
83401

18

Texaco USA

PO Box 2100
Denver CO 80201
4601 DTC Boulevard
Denver CO 80237

January 6, 1986

RESOURCE MANAGEMENT PLAN
LEMHI RESOURCE AREA
IDAHO

Mr. Jerry Wilfong
Lemhi Resource Area Manager
Bureau of Land Management
P. O. Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong:

Texaco has reviewed your Draft Environmental Impact Statement and Proposed Resource Management Plan, and appreciates the opportunity to make these comments. The Lemhi Resource Area lies within the Overthrust Belt, a geologic province that offers one of the few remaining hopes for the United States to achieve energy independence. We, therefore, view with grave concern any attempts to restrict or inhibit exploration and production in this vital area.

10-1 The high potential for hydrocarbons in the area is exhibited by the fact that almost 90% of the Lemhi Resource Area is leased for oil and gas. Access to this area should be limited only by the minimum legal standards established for environmental protection. In areas where conflicting resource values may outweigh mineral values, the BLM should identify what minimum environmental protection is necessary to meet the plan objective for these resources.

It is Texaco's recommendation that BLM modify the proposed action to include Alternative D, the Mineral Development Alternative, as the Preferred Alternative. This would result in a more balanced, multiple use oriented resource management plan that would fit the stage already set by the facts.

Very truly yours,

G. M. Barrow
Land Department

1-8-86 **20**

NUCLEAR FUELS and GOLDEN PLEASURE, INC.

CARROLL W. WELLS
PHONE 756-3308

BOX 1233
SALMON, IDAHO 83467

District Manager
Bureau of Land Management
Salmon District Office
P.O. B. 430
Salmon, Idaho 83467

Dear Sir,

My father and I wish to share our concerns to your proposed Lemhi Management Plan. We think there should be more wilderness in Lemhi County, Idaho and we think there should be open access to the mountains etc., not being fenced or gated shut. We believe in multiple use of our environment. We have lived in Lemhi County, Idaho most of our lives as did our forefathers and we wish to continue to live here and to be able to utilize the natural resources in the County and not having the natural resources locked up by the government.

Sincerely yours,
Carroll & Pete Wells

21

Salmon, Idaho
January 8,1986

District Manager
BLM
Box 430
Salmon, Idaho 83467

Gentlemen:

I support Alternative A with two amendments: 1. Active preference continue to be the stocking level. 2. AMP'S be developed with necessary inporvements to operate under the principles of Multiple Use and Sustained yield.

Writing from the background of an ordained minister, I bring to you and the people of Lemhi County the following directives and information from the Bible, the Word of our Creator. (Please read Genesis 1:27-30)

When God created the earth and man, He said to man. "...replenish the earth and subdue it: and have dominion over...every living thing... herb... every tree, etc.," This includes all minerals and everything that the earth produces. The word "subdue" comes from an original Hebrew word which means to make the earth subservient, bring into subjection, to conquer. God said: "...it shall be for meat...," meaning that it was all given to man to sustain man's wellbeing and existence on earth.

All of this involves "Multiple Use" and requires wise management of all resources - "for meat," not all for recreation as some would have it, at the expense of the logger, rancher, miner and wage earner. Man was not made to give way for and to wild game and wilderness, (we have enough wilderness) but these serve (in reason) the needs of man.

It looks like the Fish and Game (although somewhat needed) the Sierra Club, the wilderness people and the environmentalists are trying to squeeze the farmer, logger, miner and working man out of Lemhi County so that this can be a recreational and hunter's paradise. (Although I am an avid hunter and I also love to fish.)

For analogy, I bring you the story of the Arab and His Camel. One cold night the Arab was sleeping in his tent when the camel stuck his head in and said, "Master, my ears are cold, may I stick my head in?" So the Arab let him. A little later the camel said: "My shoulders are cold, may I get them in too?" So the Arab let the camel get half his body into the tent. Then again later the camel said: "Master, my hind end is cold, can I get it warm?" Whereupon the Arab let the camel get his whole body into the tent. It was but a little while later that the camel discovered that it was too crowded and said: "Master, I guess you will have to move out."

The squeeze play that is taking place in our country is taking bread and butter off the tables of families in every sector of our community. Outside authority over our local BLM people require less acres for grazing cattle, in order to give room for elk and deer, more room as recommended by Fish and Game. The environmentalists and Sierra Club camels are moving the loggers, miners, farmers and wage earners out of their tents. While moral decency and good old American principle should remind us that jobs and opportunity for feeding and housingour children and families must not be taken away until they are replaced by that which is equal or better.

(please see reverse side)

I have this one last comment. Hadley B. Roberts' Letter to the Editor (Recorder-Herald, January 2,1986) is not as accurate as he would have us to believe. A panplet produced from a study made in the State of Washington shows the picture of eld, dead and dying from malnutrition caused from dense forest growth. Thick timber had crowded out forage and browse. That study brought out the fact that logging and proper management produces good gane habitat.

Sincerely,

Wilfred L. Keele
Wilfred L. Keele
700 Wilcox St.
Salmon, Idaho 83467

22

United States Department of the Interior

FISH AND WILDLIFE SERVICE
BOISE FIELD OFFICE
4696 Overland Road, Room 576
Boise, Idaho 83705

January 7, 1986

Kenneth Walker, District Manager
Salmon District Office
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker:

Our endangered species biologists have reviewed the draft Lemhi Reaource Management Plan and Environmental Impact Statement. We concur with the content and direction of the Plan however, we request that as the Plan is implemented Section 7 consultation be considered where appropriate on specific projects. 22-1

Sincerely yours,

John P. Wolflin
Field Supervisor

cc: FWS, EC, Washington, D.C.

23

January 9, 1986

District Manager
Bureau of Land Management
Salmon, Idaho 83467

Dear Sir:

As citizens of Lemhi Valley for the past 40-years we are concerned about how our public lands are being managed.

We have reviewed the District plan and find that we have the following comments:

Lets first address the issue of Eighteen Mile Wilderness Study Area. We do not want any more wilderness in the state. We feel that public land should be used so they best serve all peoples.

We do not feel that the lands can support much more big game nor can the ranchers absorb any more cuts in cattle rights. This has to be decided on an individual basis with everyone working toward range improvements. It appears to us that when big game animals invade ranchers haystacks for feed due to incorrect fish and game measured carrying levels, that fish and game should be the agency supplementing big game winter feeding. We believe intensive and consistent seeding would benefit ranchers and big game animals as well.

We feel timber that meets criteria for sustained yield should be offered for sale. Closing roads after logging is a beneficial practice and these roads do not need to be first class.

We believe that designated Cultural Areas and irreplaceable historical areas should be greatly protected as it seems many citizens cannot resist intentional or unintentional vandalism.

We would like to see cautious management used for roads or motorized vehicles. Most BLM areas will not support intensive motorized use of their lands. We would like to see the Scenic and historic trails managed intensly as they are not replaceable.

We would like to see affected riparian habitat areas managed to maintain good watershed base, but grazed by cattle. We don't know what system would be best for this. Perhaps more water troughs and salt licks away from streams and an intensive seeding program of applicable grasses and forage undertaken in these areas. We believe that the fees for cattle AUM's should return to on-the-ground improvements of each allotment. 23-1

Jan 9, 1986 **25**

Page 2

We believe that good management is management that uses, maintains and improves land used by all the people.

Thank you.

Mr. and Mrs. Kenneth E. Hyde

Kenneth E. Hyde
509 Neyman
Salmon IDAHO

Dear Sirs,

We would like to express our support on multiple-use. Idaho now is having financial problems. Taking more land off the tax roles doesn't seem to be a solution to us. Doesn't Idaho have more than its "fair share" of government-owned land? Why should the elete enjoy Idaho over the people that has made Idaho so desirable to out-of-staters? Can't we all "Enjoy"?

Sincerely,
LaMar Cockrell
Mona Cockrell
RT. 1 Box 9
SALMON IDAHO

24

District Manager
BLM
Box 430
Salmon, Id ho 83467

Dear Sir,

After a lengthy consideration of the Lemhi Resource Management Plan we find that we cannot support the plan for a number of reasons.

1. The overall theme of the plan is too oriented toward wilderness, wildlife and recreation. These are indeed resources, but they do not contribute greatly to the ecconomic base of the local area.

24-1 2. A great deal of emphasis is placed on fencing riparian areas. I believes the BLM sete fence specification for theses areas that allow for the easy passage of wild game. This type of fence will not turn cattle, so what is the purpose of going to this expence.

3. The sawtimber acreage under plan F would be reduced as compared to plan A. Saw timber acres are toovaluable to be replaced by wilderness in Lemhi C unty.

4. At this time the IdahoDept. Of Fish & Game has finaly decided they may have too many deer and elk for the amont of winter range in the Lemhi River foothills.This be the cass, there is no reason to provide forslarger big game herd in the area.

5. There is absolutly no need for any expansion of wilderness in the Salmon BLM District. Lemhi County has given its full share to wilderness. A great many people are at present using the 18 Mile Study Area for non-wilderness recreation. The area does not show signs of abuse. Why throw these people out.

6. Other alternatives are also quite lopsided and extrene. The most sensible of them all is alternative A. It is least expensive to administer, and most fair to all concerned. We can support alternative A.

Sincerely,
E. L. Gilpin
Alvis Gilpin
515 Boyd Av. A
Salmon, Idaho 83467

26

QUINTON SNOOK
GENERAL CONTRACTOR
ROUTE 1—BOX 49 PHONE 756-2787
SALMON, IDAHO 83467

January 10, 1986

District Manager
Bureau of Land Management
Box 30
Salmon, Idaho 83467

Dear Ken,

We, Quinton Snook and Lois Snook, favor the Alternative G in the proposed Lemhi Resource Management Plan. We also favor no further wilderness in Lemhi County at this time; we feel that the River of No Return Wilderness in the county is more that adequate.

We would like to emphasis the need for good management in regard to livestock grazing. The Haynes Creek Association has a workable rotation grazing plan. However, weed and sagebrush control and re-seeding programs that have previously been practiced could greatly improve the present and future grazing.

Sincerely,

Quinton Snook

Lois Snook

27

VEARL C. CRYSTAL
DISTRICT 30
CLARK, CUSTER, BUTTE,
JEFFERSON AND LEMHI COUNTIES

HOME ADDRESS
P.O. BOX 78
LEWISVILLE, IDAHO 83431
PHONE (208) 754-4706

COMMITTEES
AGRICULTURAL AFFAIRS
FINANCE
STATE AFFAIRS

ASSISTANT MAJORITY LEADER

Idaho State Senate

CAPITOL BUILDING
BOISE

January 9, 1986

District Manager, B.L.M.
Box 430
Salmon, Idaho 83467

Gentlemen:

This is to inform you that I support Alternative A, with two amendments:

1. Active preference continues to be the stocking level.
2. AMP'S be developed with necessary improvements to operate under the principles of MULTIPLE USE and SUSTAINED YIELD.

There are many reasons we cannot support the preferred alternative, such as the high cost, it attempts to cut livestock grazing for the benefit of wildlife and recreation, fence standards need to be modified for each situation, and for many other reasons.

It is my opion that the preferred Alternative F emphasizes recreation and aesthetic values too much
27-1 over commodity production on public lands. In addition, fencing to prevent livestock grazing is not the answer to deteriorating riparian habitats.

Very truly yours,

Vearl C Crystal

Vearl C. Crystal
Assistant Majority Leader

29

RAY E. INFANGER
DISTRICT 20
LEMHI, CUSTER, CLARK
AND JEFFERSON COUNTIES

HOME ADDRESS
ROUTE 1, BOX 174
SALMON, IDAHO 83467
PHONE (208) 756-3667

COMMITTEES
APPROPRIATIONS
AGRICULTURAL AFFAIRS

Jan 9, 1985

House of Representatives
State of Idaho

Ken Walker
District Manager
B.L.M.
Salmon, Idaho

For:
Alternative A
with 2 Amendments

Dear Ken,

I am for Alternative A, with 2 amendments
1. Stocking level should continue active preference.
2. Necessary improvements to develope AMP's necessary to operate under principles of multiple use and sustained yield.

29-1 I take this stand because:
(1) this plan is 1000 times more cost effective.
(2) the "preferred" plan is too costly
3. This plan will not force ranchers to pay for game costs
4. Livestock pays for local schools - not game.
5. If you increase game, there is no winter feed for them with a game increase.
6. Fence standards should meet each situation.
7. Spring overgrazing could be solved with proper rotation.
8. The plan as stated does not put more land under federal control
9. Other plans give too much emphasis to unproved aesthetics value & recreation. Both will still be there.

Yours for better stewardship

Sincerely,

Ray Infanger

28

Lemhi, Idaho
January 9, 1986

District Manager
BLM, Box 430
Salmon, Idaho 83467

Gentlemen:

We support Alternative A with two amendments. 1. Acting preference
28-1 continue to be the stocking level and 2. AMP's be developed with necessary improvements to operate under the principles of multiple use and sustained yield.

We need no more designated wilderness areas. There are thousands of acres of public land that by its very nature will always be beyond the use of man.

The forage on public lands has no value by itself, but when it is utilized by domestic cattle and sheep it is turned into valuable protein food so necessary in the world today.

The stockmen, in cooperation with the BLM and the Forest Service, are and have been the only ones developing and maintaining these lands so that they may continue to yield their bounty. Their improvement of seeding, water development, etc. have also benefited the wild life.

I, therefore, do not see the reasoning in the trend to cut the rancher's production in favor of wildlife and recreation. Without the free grazing on private lands by wildlife, their existence would be greatly jeopardized; likewise, they would also be threatened without the range developments now maintained by the stockmen.

Very truly yours,

Sam P. McKinney

Sam P. McKinney
P.O. Box 52
Lemhi, Idaho 83465

30

Lemhi Livestock &
Wool Marketing Ass'n., Inc.
206 Courthouse Drive • Phone 756 2824
SALMON, IDAHO 83467

January 10, 1986

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir,

After studying the information presented in the Lemhi Resource Plan, the directors of this association would like to go on record as favoring an additional alternative. We
30-1 feel that there is already sufficient wilderness in the county and that the deer and elk depredation problems are great enough to effectively prohibit any increase in wildlife populations. We are not convined that there are any range problems severe enough to warrant the 20% number reduction proposed in your preferred plan.

For these reasons, we favor an alternative with the wildlife section from Alternative A; the minerals and lands section from Alternative G; and a new range section. The
30-2 range section should provide: 1) An AMP on every allotment; 2) initial stocking level at current use; 3) about 25,000 acres of sagebrush control; 4) about 4000 acres of crested wheatgrass seedings; 5) as many springs developed as feasible consistent with the AMP's to be developed; and 6) minimum pipeline and fence construction to meet AMP objectives.

Thank you for inviting comment.

Sincerely,

LaMar Cockrell

LaMar Cockrell
President

31

10 January 85

Dear Jerry:

We would like to endorse the BLM's choice of Alternative F as the best proposed management plan for the Lemhi Resource Area.

The attitude that cattle cause no more damage than wildlife to riparian habitat is ridiculous. Since our property adjoins the Haynes Creek grazing allotment, we can verify that a large number of cattle live right in the creek bottom in late summer. By September the stream-bank soil is compacted, the remaining vegetation is trampled into the mud, the creek water is foul with manure, and the resulting erosion looks nearly as bad as spring runoff.

If certain people's comparison of cattle and woodland bison is to be valid, than logically all the fences should be removed and the cattle allowed to roam as freely as the bison did, thus minimizing concentrated impact.

We surely don't object to cattle use of public lands; however, cattle are only one aspect of a multiple use plan. Thus, we favor a reduction of AUM's, fencing of vulnerable streams, and preservation of the proposed wilderness at Eighteenmile.

Thank you.

Sincerely,
Mike Monroe
Alexia Cochrane

Mike Monroe
Alexia Cochrane
Rt. 1, Box 48 B-1
Salmon, Idaho 83467

33

Jan 11, 86

Dear Sirs,

I am in full support of Multiple Use.

I am in full support of the protection of the forest wildlife, fish and soils for the locale people, any thing less will cause

Thank You
Peggy M Kennaghy

32

Bureau of Land Management
Salmon District Office
Salmon, Idaho 83467

To Who it may concern:

Dear Sirs:

In regard to your management plan for the Salmon area. I would like to see all area put in a multiple use category. We need to use this land for the betterment of the people who live here and want to leave here. We need no more wilderness. Thank You

Sincerely Yours,
Walter J McConaughy
RR1 Box 37
Salmon, Idaho 83467

34

J. ALLEN JENSEN
Canyon Road
Route 7, Box 166
Idaho Falls, ID 83401

10 January 1086

District Manager
Salmon District Office
U.S. Bureau of Land Management
P.O. Box 430,
Salmon, Idaho 83467

RE: Draft Resource Management Plan and
Environmental Impact Statement
Lemhi Resource Area

Dear Sir;

I have read and studied the above-named document at some length. Having served for about four years on the Citizens Advisory Committee for the Northwest Region of the National Park Service under then Secretary Rogers C. B. Morton, I had considerable exposure to Environmental Impact Statements and Planning and Development Programs generated by the Park Service and developed an appreciation for the time spent on research, study, writing and rewriting that goes into the drafting and publication of these works. I would like to compliment you and your staff on the painstaking work that has gone into the production of this document.

With your having developed several alternative plans, I can understand that your preferred alternative, Plan "F", would be a difficult one to give up. However, I urge that you adopt Alternative Plan "A" and continue on with the course which the BLM has pursued so successfully in the past.

It would be unfair of me not to disclose that I have close family ties to one of the livestock operators in Lemhi County and that I have grave concerns about the future of the livestock industry here even under present conditions, let alone under the impact of a new and different operating plan.

The economic reality at this period in time is that every day brings increased difficulties in coping with the various forces that, intentionally or unintentionally, conspire to put an end to successful livestock operations in Lemhi County and, for that matter, in the rest of the state.

These same difficulties are being felt by your department. You are called upon to do more and more, yet the odds are that because of the horrendous problems facing our national budget you will have fewer and fewer resources with which to do what it is you are being called upon to do.

Under these circumstances it would apppeat that a continuation of the programs you are doing so well at the present time would be a prudent course to follow. And this would seem to indicate that Alternative "A" ought to be the preferred alternative.

It should be obvious that it is in the livestock operator's best interest to see that range land is consistently improved and that the quality of his stock is improved. It would also be obvious that the goals of the BLM and the Livestock Industry are inseparably bound together. A healthy livestock industry makes it easier for the BLM to do its job. Divergence from time-tested procedures cannot help but put additional burdens on the livestock industry and, ultimately, on the Bureau.

The adoption of Alternative "A" would represent a continuation of the multiple use program which has served this area well. Recreation, conservation, mining (where economical), timbering (where economical) and ranching (where economical) have all been successfully pursued under the existing policies and practices. Why change something that is working reasonably well for all concerned?

To some there is an objection to Alternative "A" because it seems to favor the livestock industry. Of course it does. And rightly so! Of all the many users of the land the livestock operator is virtually the only one who has made a capital investment in the public lands. Save for the timber and mining industries, the only other users pay nothing for the use of the land or the streams. They use the resources for their recreational enjoyment, which is all to the good, but as we have pointed out--there isn't all that much joy in the livestock industry these days. So what, if the livestock industry would be favored by Alternative "A". Its damn near the only thing that does!

This brings us, of course, to one group, the wilderness advocates, who cry that what this state needs is more and more and more wilderness to meet the needs of those who will never avail themselves of a wilderness experience.

Your own discussion of the Eighteenmile Wilderness Study Area (WSA) reveals a present use that is barely susceptible of tabulation and your prediction is that in the foreseeable future such use is not likely to increase. If that is the case it is difficult to see that you have made a case for a recommendation to Congress that the WSA should be included in the nation's wilderness system. Where is the necessity--or even the desirability?

From your study it is apparent that even if nothing is done to implement wilderness designation, the wilderness experience in this particular area can be achieved in the foreseeable future by anyone who desires to make the trip. The gray wolf, if there is one, will never be disturbed.

Sincerely,

2

It would have to be surveyed to know the exact boundary. This past summer I showed Sue Kaszeck a pile of rocks which I believe to be the northeast corner of this tract. It is one-fourth mile from the rest of the ranch. Herbst sold that land to Hugh Sharp who, in turn, sold it to me.

(3) "Livestock distribution is unsatisfactory." I am well aware that livestock distribution is unsatisfactory, it has cost me money, and it is the BLM - not myself - who is responsible for this condition. In 1972 I requested the BLM ranger, Curt Smith, for fences so the grazing could be rotated. He promised to be out in a couple weeks to look at it but he never did come. Instead, I received a request to allow a "sportsmen's access" road across the ranch. I wouldn't agree to it. I believe it was three times, after Larry Bardsley became the ranger, that I spoke to someone at the BLM office about the need for fences and every time they got the subject changed around to their desire for that road. I regarded it as an intrusion upon my constitutional right to control my property and, in about 1976, I wrote a complaint to State BLM Director Mathews about it being a conspiracy to defraud me of my constitutional rights. I heard nothing more about tha road, neither did they construct any fences.

In May, 1979, they tried a different tactic. I received a letter stating that "in order to properly manage the national resource lands behind the ranch" it was necessary to have a public road through the ranch. The letter cited federal legislation which purported to authorize them to them to hire an appraiser to decide what damages to ellow and told me to set a date for the oppraiser to come. It said I had the right to meet with the appraiser or have my representative do it. The letter had Finleyson's signature but I have felt certain that Bardsley was the one who was responsible for it.

I had drafted a reply to the letter but hadn't yet got it typed and mailed when I got a telephone call from the BLM asking me to set the date for the appraiser to come. I replied that I hadn't agreed to any road. The caller then said "Maybe you should talk to Ranger Bardsley". I replied to that statement that there wouldn't be any road and hung up.

The next dey I got the letter mailed to Finleyson. I pointed out that, under the American Constitution, only courts had authority to appoint an appraiser but federal agencies had no such authority and I quoted a section from a law book which said that an unconstitutional law "is null and void". I said that we believed four calves had been stolen from on the ranch and we had had trespassing to other parts of tha ranch away from the road up Pratt Creek. A public road would increase

January 7, 1985

35

Bureau of Land Management
Salmon, Idaho 83467

Sirs:

In the " 'I' Category Allotments Problams/Conflicts" on page 833 of the Lemhi Resource Management Plan and Environmental Impact Statement it states:

(1) "Certain areas are in unsatisfactory condition due to sagebrush density." -- Sagebrush control is certainly desireble in those areas.

(2) "Boundary is unfenced." -- Actually, the only undefined extensive area is between the BLM and the National Forest. I have not been concerned about it because my cattle don't go that high, anyhow. As BLM District Manager Ed Jones told me in 1971, "some of the fences were built for convenience". There are two locations here where my fence encroaches upon the BLM in order to stay on a ridge rather than for the fence to be on a slope of more than 50%. -- In another case there is a small amount of BLM trespass in order for the fence to stay on a windswept ridge instead of being where it would be broken with e snowdrift every winter. -- In one case the fence drops down onto my land to make an easier route for cattle movement. -- In another location a lane extends onto my land for about 200 feet to allow the cattle to get water in Pratt Creek. -- In two locations the fence follows the bottom of the mountain rather than cornering up onto it. This allows cattle movement rather than restricting it. -- At the mouth of Pratt Creek Canyon the fence drops directly down into the canyon instead of staying on the line. This makes several acres of my land which is outside of my fence. I don't know where the actual line is located but a Water Department map made it appear that the real corner of the ranch is somewhere very close to the hedgete on Pratt Creek. -- At one place near the southeast corner of the ranch there appears to be an encroachment on the BLM of several acres. This obviously made for easier fencing.

I don't know whether there is more BLM land included inside of my fence or whether more of my land is with the BLM but I believe it is about a standoff.

This does not take into consideration a tract of sixty and e fraction acres which is unfenced from the BLM but does not join the balance of this ranch, instead, it borders onto the Schaffner property. One corner goes to the draw where Schaffner's ditch is located. Farrell Herbst told me that he purchased that land in order for cattle to have access to water so I believe that is the only access to water in that eree of the allotment.

the chances for both. Also, one of the reesons why we hed chosen this ranch was its seclusion and a public road would destroy that value. I had allowed hunters and fishermen to cross the ranch and Bardsley wes aware of it because he hed been one of them when he was with Jim Englebright one morning. Jim was a friend of mine and told me about it. I told in my letter that I elways remove cattle from one pesture before before hunting season begins. A public road there would make livestock more vulnereble ell summar.

Nearly a month later I received a telephone call from Bardsley saying that he and Finleyson would like to meet with me and offering to come out to the ranch to do it. I replied that I was going to the auction that day and would stop at the BLM office, which I did. Harry Finlayson, Larry Bardsley and another man were in the room. Harry was very apologetic about it and three times he said it was a misunderstanding. I'm sure it wes just that - but a misunderstanding about how far I could be pushed around!

Since then the BLM has twice erected signs on the back road which said Pratt Creek and pointed towerd the canyon. Also, one such sign wes on my private property. They should realize by now that my right to control my property is not negotiable.

Early in 1982 I wrote to Bardsley that I wes going to begin constructing fences on the BLM "with or without BLM permission". I sent a copy to the State Director, Cleir Whitlock, telling about what hed happened and requesting Bardsley's transfer and repeated thet request later. Mark Whisler became the ranger and we got e fence just south of Pratt Creek which hes helped a lot. More fences and some water development is needed.

(4) "Noxious weed spreading." The only noxious weeds that I know about are musk thistles. Two yeers ago County Agent Bob Loucks said he had released some parasitic wasps which should control those thistles. Lest summer I noticed a considerable reduction of the thistles on my own property so I believe it is being successful. I understand that the BLM has also released some of these wasps. When it will do the job, this biological method of control is certainly to be preferred.

(5) "Present management needs coordination between permittee and the BLM." I agree and, again I state, the BLM has not provided means wherein good management was possible.

(6) "Vigor of key forege species is low." Again, the fault lies with the BLM although I believe an unbiased opinion would show it is actually quite good on much of the area. It suggests to defer grezing on ell or part of the allotmant. Your records will show that I have regularly deferred grazing for sbout ten years. It is the lowest part of the allotment which needs most protection and it could be done with a comparetively short fence.

The RMP suggests to change the salting orogrem. I regularly place salt to draw the cettls away from the water to the outlying areas. This has not always been true and there are evidences of selt having been placed in the past for convenience and at places where it should never be pleced.

From listening to Harley Metz explain some things at the meeting of the BLM with the public, it became apparent that the reason some of the BLM permits were being cut back was that they had not averaged more heavy usage over the past five years. He was making an explanation to Bob Charles of the Muleshoe Ranch at the time and said there had oaen non-usa the first yaar of the five-year period by the previous owner. This makes it very obvious that the BLM is grabbing at every excuse to cut back on legitimate use of the grazing. On the one hand, they want to restrict the grazing to improve the renge, but if it does get restricted for any reason whatever, that is then used as an excuse to decrease the allotment. Such an action is simply to please the environmentalists regardless of the true needs of the allotment and is utterly dishonest to the permittaa. I don't like to speak out like this but it is being forced upon me. The Alternative F, which is preferred by the BLM, would cut back my allotment by 53% short-term and 48% long-term. This is outrageous. This might be partly in revange for ma refusing to permit the public road through the ranch. It also may be partly a case of incompetency by BLM personnel to judge the range condition. I saw such a case in wyoming and have been told sbout one a few years ago in tha Challis area. In Wyoming, the Forest Service demanded a reduction in the Fish Creek Allotment of the Teton National Forest but the permittees objected. It was agreed to leave the decision to be determined by the result of e study by a Range Survey Team from the University of wyoming, which was directed by Dr. Alan Beetle. There wes a five-year study of the aree and they compared it to various areas which received no grazing at all. I was present when Dr. Beetle gave a very detailed report of what had been done by the range survey taam. He concluded the report

vehicles too often are responsible for starting erosion. I've also observed that the cattlemen are usually blamed because they are a convenient "whipping boy" but anyone who thinks cattle will trail either up or down much of a slope should try to get them to do it! Unless forced to do otherwise, cattle invariebly travel quite horizontally - the up and down trails ara from game.

It is, as yet, undecided as to who shall receive copies of this letter but there will be some copies sent locally and, probably, farther.

Sincerely yours,

Willard R. Moulton

willerd R. Moulton
Rt. 1, Box 30
Salmon, Idaho 83467

by saying that, except for soma small areas which he identified, the allotment wes in excellent condition. The Forest Service personnel who attended the meeting appeared stunned. Here was e man who was competent to teach range management to them but who agreed with the permittees instead of the government personnel!

In the case in the Challis aree, a group ware looking over some allotments. A BLM officiel kept complaining about conditions and another man in the group frequently disputed what he said. After the other man left the BLM man asked "Who was that man who thinks he knows so much about range management"? He was answered that tha man was Dr. Wayne Burkhardt, who had taught range management at the University of Idaho.

The BLM report says the Pratt Creek Allotment is in "static condition". Doyle Mulkey has lived beside it for more than seventy years and told me two years ago that it wes the best he had aver seen it.

Alternative A would continue present management which would mean no fences or anything. It is unacceptable.

Alternative B would favor livestock grezing management but it does not show intent to improve the allotment. Why? It has been my understanding thet part of the grezing fees are designated by law to range improvement. It appears to ma that every alternative is designed against the permittee although B looks the best.

The only alternatives which show any intant to improve the condition of the allotment are those that also show the cattle numbers are to be drastically reduced - both short-term and long-term. This doasn't make senee. Whet is the reason for 200, 500 or even 1,250 acres to be improved if the improved grazing isn't to be used? This Resource Management Plan and Environmental Impact Statament looks like a massive fraud or greet incompetancy, yet we are expectad to choose one of them. It is too much like having a choice of being poisoned by strychnine or arsenic.

I oppose any more wilderness area in Lemhi County. The govarnment has too much locked up already. Multiple use is proper but this allotment is having multipla usa already. I am concerned about ORVs on the unit. My oosarvations have been that

36

January 13, 1986

District Manager
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Gentlemen:

After a very thorough review of the Lemhi Resource Management Plan, I am sorry to say, but I feel all professionalism was left out when figuring range production stocking levels.

After all the soil samples taken, prior range analysis, on the ground observation, stocking levels were set at an acre figure per AUM arbitrarily across the whole resource area. The nine acre figure proposed by the BLM compares to 3.48 acres on
36-1 the Forest Service, or thirty-nine (39) percent of the carrying capacity of the Forest. A lot of this range joins the Forest and would therefore have a similar carrying capacity, while some of the really low ranges would have a lower carrying capacity.

Also, your proposed increases in wildlife numbers seem
36-2 to already be admitted in error, therefore, that should be re-adjusted allowing a further increase in domestic AUM's. (Reference B-11)

WE CANNOT AFFORD ANYMORE WILDERNESS!!!!

It seems unreal in this day and age of technological advances that we cannot increase our carrying capacities on the range without any adverse impacts to other resource values. We are continually increasing our carrying capacity on private ground.

MOST RANGE IMPROVEMENTS ARE ALSO BENEFICIAL TO WILDLIFE!

I prefer the original plan, Alternative A.

Yours for improved public lands,

James Whittaker

James Whittaker
Box 240
Two Dot Ranch
Leadore, Idaho 83464

37

January 13, 1986

District Manager
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Gentlemen:

There are more young families working in agriculture in the Upper Lemhi Valley than there have been in a long time.

To de-emphasize commodity production in favor of wildlife and recreation would be the real crime in this economically devasted area.

And then to expect the grazing-permittee to subsidize recreation is too big a pill to swallow.

We are hard working people in this valley. We love this valley and chose this way of life as caretakers of God's creations. To take away the means of supporting our families and to make it too tough for young families to stay here are surely not your intentions.

The decisions you make for the Lemhi Resource Management Plan affect the people in California, New York or Ohio only ideologically. They do not change their way of life at all.

But these decisions affect personally, physically, monetarily, the people of Lemhi County and the surrounding areas.

You cannot in good conscience implement an alternative that will cost the tax payers and grazing permittees more money.

You cannot in good conscience implement an alternative that de-emphasizes commodity production for wildlife and recreation.

We support Alternative A because it is the closest alternative that fits the existing situation. However, two amendments should be included in Alternative A; 1. that active preference continue to be the stocking level and 2. that allotment management plans be developed with necessary improvements to operate under the principle of MULTIPLE USE and SUSTAINED YIELD.

Sincerely yours,

Paula J. Whittaker

Paula J. Whittaker
Wife, mother of four, chief cook,
Ranch bookkeeper
Community church leader
Community organist for any school
function, wedding and funeral.
Box 240
Leadore, Idaho 83464

management. But why should they be able to run over private people and private property. I know I went thru this with a neighbor who held what he considered domesticated buffalo. This group is for the survival of buffalo.

This group gives no consideration for the millions of dollars spent for the elimination of Brucellosis, and no consideration for those livestock people near the park whose herds of livestock must in turn be quarantined in case of disease spread. These situations could happen here.

Why should we worry or be concerned? Brucellosis is a contractable disease to humans. Much time and money have been devoted to eradication of this disease. Now here are this small group (about 7) be able to be so vocal and create a fear spot to keep the disease alive?

How many of you people read the article in the Outdoor Livestock Reporter of a gentleman giving a report to the Sierra Club. The Mr. Allan Savory, he is of the Center for Holistic Resources Management. He says range lands can deteriorate more rapidly when no cattle are present, than they do from overgrazing. He also indicates livestock under management can be a most powerful tool in regenerating wildlife habitat. He gives instances

of 300 years of no grazing by Indians and not a desert in print. He also gives instances of no grazing (20 - 30 - 50) years and the result being signs where the lands are showing signs to revert to desert. He had slides to show the trends noted above to verify his studies. He recommends a happy medium where livestock being moved around, or by rotation can create desired effects to stimulate plant life.

I personally feel that in my lifetime that most areas and ranges that have had a chance under proper use and reduced stats have shown a definite response. I have felt that we needed range management be whatever department BLM or Forest supervision. Also if these 2 departments were consolidated, it would help to lower the expense and in effect could help the national debt.

We do not need to have the expertise of people dedicated to long hair or the professional world like mad as the bar to chase range management expertise.

There are people on the ground with ground floor experience and under the guidance of range trained people to form plans of allocation, and management of livestock, to stabilize these invaluable

38

Salmon, Idaho
Dec 6, 1986

RE Lemhi Resource Mgt. Plan

To whom it may concern:

Dear Sirs; Mr Kenneth Walker;

In pertainance to the B.L.M.

The problem seems to keep returning, never settled, and under constant study. Also under the regular program followed by the B.L.M. will return every five years. I am talking about letter writing, reading the same study funds over and over and never to arrive at a goal.

In the 1970s Congress passed regulations to have studies on public lands to satisfy small handfuls of people that seem to think their organization needed to be recognized. Their affluent people with their noses were heard, which brought them a place to holler. Now there are more of these organized groups of which some have only (5-10) people and right or wrong demand to be heard. The last one I've heard of is a small group protesting buffalo from hunting in Montana north of the Yellowstone Park. This group quite emphatic for survival of Buffalo. These buffalo seem to want to wander beyond the limits of the park and use these roads to enlarge the park ecosystem. Personally I have no resentment toward buffalo as long as the animals be under

resources.

In my lifetime I have seen areas which were ideal for the wildlife while in the presence of livestock and livestock people. Be degenerated by the roads put out there whether it be for ranger management or T.V. towers or just plain pot getters.

There are plain and common things we need, like lumber for homes and food to eat and roads for production as needed. After that these roads should be closed and if not they are a definite detriment. These are assets put here for our use, but why should we create people pollution with garbage and waste to be seen forever. To close these roads would ultimately leave the areas logged or grazed in a more pristine atmosphere and hold the lands in a more natural state. So why do we need any more Wilderness?

The timber people are not trying to ruin the public areas or ruin anybodys environment. They treat public land with care. They know they need to be able to come back again. They are not opposed to Multiple Use.

The livestock people are not trying to beg the situation. Most of them are there this year and know the land needs respect so the renuable

5

resources to their needs will be there in the future. They are also there for Multiple Use.

I am not a poor loser I am a true Conservationalist. My standards now and in the past have been to leave it better than it was when I came. So far this is a true and verifiable statement. My theories are not based on emotions therefore let us leave what is working in a working shape. Whatever alternative we select A or be it F does not matter, let's find the alternative that is nearest to what we have and fine tune the product. It will be better for everybody.

Thanks for Your Time

Yours Truly,

Eugene Alexander

January 10, 1986

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, ID 83467

Dear Sir:

This is written pursuant to the provisions of a letter from the Associate State Director of the Bureau of Land Management, dated October 1, 1985, soliciting written comments by January 13, 1986. We hope you will consider this response timely.

The undersigned are citizens of Bonneville County who have substantial ties to many of the ranchers and residents of Lemhi County. We are aware of the proposals in the Draft Resource Management Plan and Environmental Impact Statement for the Lemhi Resource Area and make the following comments:

1. The economic stability of Lemhi County depends upon continued management of the public lands in a multiple use mode--as they have been in the past.

2. The existing use, as outlined in your Alternative "A" seems to us to be the best plan for the future. The Bureau certainly has the authority to monitor, plan, develop and supervise the lands under its jurisdiction in a continuing progressive manner, which, in partnership with the users thereof has resulted in slow and steady improvement of the total resources of the county. Why make a change?

3. The concept of multiple use--the greatest good for the greatest number of people-- would seem to rule out the proposed plan for Wilderness in the Lemhi Resource Area. We believe we have enough wilderness in this state. Wilderness, by definition, excludes multiple use as it has traditionally been known. By your own studies the present use of the proposed Wilderness Area is such that anyone who wishes to have a wilderness experience can have it now and will be able to have it for years to come. If the system works, don't fix it.

This country urgently needs to cut the costs of government. It is probable that expenditures by the Bureau of Land Management will be curtailed, budget increases will come under tougher scrutiny and it is likely that operating funds will be kept to a minimum. Given this economic environment it would seem prudent to continue operations much as they have been in past years. A new program would scarcely meet the economic strictures you are likely to encounter. A new plan that cannot be implemented is worse than a continuation of past practices that have worked tolerably well.

1

It is inevitable that departures from traditional practices would place new economic burdens on the livestock and timbering industries. You are aware of the economic stress that these industries have been subjected to in recent years. In the struggle for continued existence we think additional burdens and uncertainties are not warranted and certainly not justified.

Respectfully submitted,

Idaho Falls

Committee Member Rt. #7 Box 163 Idaho Falls, Id 83401

Owen H. Hammond 150 Fieldstream Ln Idaho Falls, Id 83401

LaVere H. Hammond 150 Fieldstream Lane Idaho Falls, Id 83401

Marion G. Jensen Rt 7 Box 166 Idaho Falls, Id 83401

Mary G. Beasley Rt 7 Box 167 Idaho Falls, Id 83401

John W. Meade Rt 7, Box 167 Idaho Falls Ida

Carl M. Jensen Rt #7 Box 173 Ida Falls 83401

John & Christy Hoff Rt. 7 Box 171 Idaho Falls Ida. 83401

Rt 7 Box 180 Idaho Falls, Ida

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4.28 N 242 W Rigby, Id 83442

2613 Mill Rd Idaho Falls, Ida 83402

Box 3324 Idaho Falls Idaho 83401

153 WHITTIER ST. IDAHO FALLS, ID. 83401

590 Riverview Idaho Falls, Id. 83402

590 Riverview Idaho Falls, Id 83402

40

The Nature Conservancy

c/o Forestry Sciences Laboratory
1221 South Main
Moscow, Idaho 83843
(208) 882-3557

December 30, 1985

Mr. Kenneth G. Walker, District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker:

Thank you for the opportunity to review the Draft Resource Management Plan and EIS for the Lemhi Resource Area. The Nature Conservancy's overall goal is the preservation of rare elements of biotic diversity and it is toward this that the following comments are directed. More specifically, I am commenting on how the plan addresses two major areas:

Rare Plant Taxa - For this information I rely on the Idaho Natural Heritage Program. The Heritage Program is a comprehensive biological inventory undertaken in a cooperative effort between The Nature Conservancy and the Idaho Department of Fish and Game. The resulting data base serves as a clearinghouse for information on rare species and ecosystems in Idaho and is continuously being updated and refined, making it ideally suited for Resource Area planning.

Special Management Area Designation - A Memorandum of Understanding between The Nature Conservancy and your State Office will be finalized soon. The MOU enumerates common interests and provides for cooperation between our two organizations in several areas including protection of biologically significant areas via ACEC or RNA designations.

The Nature Conservancy suggests that the Resource Management Plan and EIS could be improved by consideration of the following comments:

1. It is encouraging that the RMP recognizes that ACEC's may be needed on the Lemhi Resource Area and has identified the method by which they will be designated. The Nature Conservancy and Idaho Natural Areas Coordinating Committee are willing to help identify biologically significant areas on the Resource Area that may be worthy of special protection. The MOU will facilitate this cooperation.

40-1 2. Your consideration of rare plant species is inadequate and erroneous. Physaria didymocarpa var. lyrata is indeed a very rare taxon but it is not "presently listed as a federally endangered species" (DEIS, page 3-30). It is only a candidate species as listing has not yet taken place. There are several rare plant species, in addition to Physaria didymocarpa var. lyrata, that should be considered in any land management planning for the Lemhi Resource Area. Foremost among them are Penstemon lemhiensis (a Federal candidate) and Astragalus tegetarioides (presently under consideration for Federal candidate status).

40-2 Knowledgeable individuals in both your District and State offices can provide a list of other sensitive species, although no rare plant surveys have been conducted on the Salmon District and such a list would only be tentative. The Idaho Natural Heritage Program is also available as an easily accessible source of up-to-date information on rare plants.

3. Monitoring during the implementation phase of the planning process should include rare plant populations. A monitoring plan for Physaria didymocarpa var. lyrata was developed in conjunction with the 1984 USFWS-BLM Conservation Aggreement and can be adapted for inclusion in the monitoring section of the RMP. Likewise, similar monitoring procedures can be used for other populations of rare species occurring on the Resource Area.

Along these lines, it is encouraging to see that endangered, threatened, and sensitive species will be used in evaluating the suitablity of BLM parcels for disposal. This implies that surveys will be done to ensure no populations exist on the tract. Such surveys could easily be included in a District- or Resource Area-wide inventory.

Thanks again for the opportunity to comment on the Draft RMP and EIS and I look forward to working with the Salmon District and Lemhi Resource Area in the near future. If you have any questions concerning these comments feel free to contact me.

Sincerely,

Bob Moseley

Bob Moseley
Natural Areas Ecologist

CC: Rosentreter - Botanist, BLM State Office
Wellner - Idaho Natural Areas Coordinating Committee
ID Natural Heritage Program

National Office, 1800 North Kent Street, Arlington, Virginia 22209

41

IDAHO DEPARTMENT OF FISH AND GAME
REGION 6
1515 Lincoln Road
Idaho Falls • Idaho • 83401

January 13, 1986

Mr. Kenneth Walker
District Manager
Salmon District Office
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

RE: Draft Lemhi Resource Management Plan and Environmental Impact Statement

Dear Ken:

Idaho Department of Fish and Game personnel have reviewed the above referenced plan and a comment sheet is attached. The comments attached to this letter pertain to the wildlife aspects of the plan, as fisheries related comments were provided in our letter of November 4, 1985.

We appreciate the opportunity to comment on this plan.

Sincerely,

Herbert A. Pollard, II
Regional Supervisor
Region 6

HAP:TP:dk

cc: U.S. Fish and Wildlife Service
Bureau of Program Coordination
Bureau of Wildlife
Tom Parker
Sally Gregory

• EQUAL OPPORTUNITY EMPLOYER •

STATE OF IDAHO
DEPARTMENT OF FISH AND GAME

General Comments and Major Concerns

The draft Lemhi Resource Management Plan is brief, well written and understandable. Those portions of the Plan and DEIS pertaining to the status and occurrence of wildlife and its habitats appears to be accurate and done in a professional manner. The analysis of the current state of range conditions, riparian zones and wildlife habitats points out in detail some obvious problems which need to be corrected.

41-1 We were especially pleased to see forage allocated by allotment for big game animals on BLM lands and a commitment to modify fences to provide wildlife passage.

41-2 The draft Plan could be strengthened by including more information on your plans for timber management for the Lemhi Resource Area. There were no maps showing, even in general terms, where your commercial forest lands are located or where you will plan timber sales and build roads. A major concern of our Department involves the harvest of timber on low elevation areas adjacent to winter ranges and access into existing security areas for big game.

41-3 Under Standard Operating Procedures, we noted no guidelines or standards for allocating forage on big game winter ranges. Without quantifiable goals, your plan is weakened. The inclusion of a timetable for achieving certain goals, such as riparian zone improvement by allotment, would also strengthen your plan.

41-4 We believe an economic analysis of the benefits provided by amenity products (such as wildlife, fish and recreation) would help identify these values and their importance when compared to commodity products. This kind of data may place more emphasis on a noncommodity alternative.

Specific Comments

Proposed Management Prescription:

Page 23.
41-5 The BLM should define "special management" on timber sales in critical winter ranges. We believe you should harvest timber on critical winter ranges only when wildlife benefits can be shown.

41-6 Under Range Management, is it a realistic goal to increase the 595 acres of poor range to good condition in 20 years?

41-7 Under Wildlife, the proposed management objective for deer in the Lemhi Resource Area should be modified to reflect the latest information in the Department's 1986-90 Mule Deer Management Plan. Current goals for deer numbers in Units 30, 30A and 29 call for an increase of about 1,550 deer by 1990. These goals reflect an

- 1 -

increase of 1,000 deer for Unit 29, 200 deer for Unit 30 and 350 deer in Unit 30A. Under Required Management Actions (pp. 24), the AUM requirements should be adjusted accordingly.

We are pleased by your commitment to improve conditions for bighorn sheep in the area between Little Eightmile Creek and Eighteenmile Creek. The Department will cooperate with the Bureau in an attempt to continue the re-establishment of bighorns in this area as transplant stock becomes available.

Page 25. 41-8 Under Recreation Management, you should consider the need for additional road closures to protect key wildlife habitats. The many miles of existing open roads on BLM ground makes control of big game harvest difficult. We suggest you include a statement that you will attempt to identify areas and roads that would benefit from seasonal road closures through consultation with our Department, other agencies and the public.

Page 33. 41-9 In the Forest Management section, another reference is made to restrictions and protection of critical winter ranges. We believe there are areas that should be included in the set-aside because of high wildlife values and, therefore, excluded from the timber base. We would be willing to meet with you and identify those areas.

Page 47. 41-10 Under Livestock Use Adjustments, it is unclear how long monitoring must be done in order to identify overstocked allotments. "Over a period of years" could mean that overstocked allotments will get no relief over the life of the plan.

Page 49. 41-11 Does the parenthetical statement "except for leaseable minerals" mean there will be no seasonal restrictions on these types of activities?

Page 50. Under Terrestrial Wildlife Habitat, it is stated that sufficient (emphasis added) forage and cover will be provided. We prefer to see the inclusion of specific and quantifiable goals for forage utilization and cover.

Page 51. 41-12 Qualifying words such as "where applicable" weakens your commitment to the guidelines provided in the Elk Habitat Relations for Central Idaho. We suggest you include the guidelines here for timber harvest on big game winter range.

Page 52. We fully support your commitment to modify BLM fences to allow wildlife passage and to provide water for wildlife at spring developments and troughs.

Page 52 to 53. 41-13 Your goals and standards for vegetation manipulation appear to be good. However, some qualifiers such as "to the extent possible",

"as necessary", "as a rule" and "if appropriate" considerably weaken this section. We suggest you eliminate the qualifying words.

Page 62. 41-14 The proposed monitoring and evaluation plan (Appendix I) referenced here is an ambitious program and hopefully within the scope of your budget limitations. Do we understand correctly that the management goal is 30% utilization of key grasses on winter ranges (pp. I-2)? That is an admirable goal, which, hopefully, you can achieve.

Environmental Impact Statement:

pp. xviii 41-15 In the Environmental Consequences Summary for Alternative E (Timber Emphasis), there appears to be a conflict since wildlife habitat improves but wildlife numbers deline from the present condition.

pp. xxii 41-16 We suggest you clarify in the text why Table S-1 shows no change in timber outputs in Alternatives A through F. The available commercial lands appear to be different in the high wildlife alternative and the maximum timber alternatives. Why is this not reflected in outputs?

Page 2-42. 41-17 On page 2-42, we suggest you consider a Habitat Management Plan (HMP) for antelope and sage grouse in the upper Lemhi Valley. The loss of habitat through sagebrush treatment projects, fencing, conversion of lands to private ownership (BLE's and sales) and grazing practices has, and will continue to restrict, the numbers and distribution of these species. A plan for managing habitats for these species in the future is needed.

Page 3-15. 41-18 If you have information on general elk occurrence before the turn of the century (some information is available), this should be included to clarify the transplants were re-introductions.

In general, the discussion on pages 3-15 and 3-17 appears to be accurate and well done.

Page 3-36. 41-19 We believe the values you attribute to hunting and fishing recreation are too low. A currently completed Idaho study indicates the values for deer hunting at $50/RVD, elk hunting at $60/RVD and $64/RVD for fishing. Details are available from Lou Nelson in our Boise Office at 334-2920.

Page 4-16. 41-20 Under Livestock, it is not clear how AUM's would be gained over the 20 year period, if, as you suggest, there is an ongoing overstocking problem.

Page 4-47. The Department believes there could be significant difference in recreation use based on the number of big game animals available for harvest under the various alternatives.

Page 4-101. 41-21 Under Riperian Habitat, there appears to be an inconsistency between 500 acres excluded on this page and page 4-86, where 225 acres are excluded from grazing.

Pages B-27 to B-61. 41-22 In reviewing the status of the various allotments and the problems/conflicts on each, it appears you have an almost impossible task , given your current management direction from Washington D.C. and your staffing/funding levels. We are especially concerned about the high stocking rates of under 10 acres/AUM on many allotments with key big game seasonal ranges and sage grouse populations. We hope some of these will have your highest priority in developing AMP's and establishing trend studies (we did not note a priority listing for development of AMP's).

Summary and Conclusions

We are concerned that under Alternative F (or G), positive changes in wildlife habitat conditions would come about very slowly, if at all. Alternative C is certainly preferable from a wildlife viewpoint. We recommend you strengthen your Preferred Alternative by considering the addition of the following:

1. Adding more riparian habitat acreage scheduled for improvement.
2. More emphasis on road management (seasonal closures).
3. Additional restrictions on timber harvest on and adjacent to critical big game winter ranges.
4. Identify and protect timber stands which provide key security areas for big game.
5. Strengthen guidelines and better define levels of forage utilization on key wildlife habitats.

42

Mountain K Ranch
Rt. 1, Box 24
Salmon, Idaho 83467
January 11, 1986

District Manager
Bureau of Land Management
Salmon District Office
P. O. Box 430
Salmon, Idaho 83467

Dear Sirs;

Please consider this letter as a reply and comment to your Lemhi Resource Management Plan. Briefly, there are several items that need to be brought out and discussed furthur. Most of the following comments have already been discussed at the public meetings and so are concerns of myself and others in the county and thus demand your review and furthur consideration.

ITEM 1

42-1 A major concern is the possibility of delaying spring turn-out dates on the lower, poorer ranges. It has been noted that these ephemeral ranges lose their forage resource very rapidly in the spring especially during hot, dry years. Delaying turn-out dates would only lessen, and waste, the availability of this resource. An alternative would be to develop AMP's for each allotment as soon as possible and implement rest rotations and deferred grazing plans.

ITEM 2

42-2 It appears that wildlife numbers are at, or exceed, the winter ranges carrying capacity to support the present numbers of ungulant wildlife. Since winter range is the limiting factor for wildlife support it makes no sense to increase their numbers if they have to be fed in the winter. There has also been a considerable amount of depredation problems on private land, especially these last three tough winters.

ITEM 3

42-3 There should not be standardized fence construction for all situations. Different situations require different fence configurations to be able to adequately cope with differing wildlife and livestock problems.

ITEM: 4

It is questionable how a stocking rate of 9 acres/AUM can be allocated across the entire Lemhi Resource Area when there are such diverse ranges and range conditions. In my own situation the present
42-4 stocking rate runs from 9.3 to 27.5 ac./AUM and the higher rate encompasses the worst and the best of my range! It appears that the arbitrary figure of 9 ac./AUM needs a considerable amount of furthur study and documentation for its support.

ITEM: 5

I don't have too many disagreements with your evaluation of our allotment; however, I do think that our range is in better condition, and improving, than the proposed cut in alternative F. would indicate. 1985 was an extremely dry year, however out of 53 cows run on the range there was only one open cow in the fall at preg. checking time. These cows were bred on the lower portion of our allotment from May 1
42-5 to July 1. This is the ephemeral portion of our range that was very dry this past year. We ran our range cows, and the cows which stayed at home, exactly the same way in 1985 as we did in 1984 (an excellent range year). The weaning weights of the steers was exactly the same both years. The condition of the cows when they came off the range was comparable both years. The same cows were on the range both years. The point I am making is that the best way to determine a ranges condition is by weighing calves and looking at the cows condition as she comes off the range, not by counting grass stems!

CONCLUSION

I feel that the above items need to be re-evaluated before the final Resource Management Plan is selected. These items are concerns of a large number of people in the affected area.

Each allotment should be evaluated individually and an AMP implemented as soon as possible on each allotment.

There is enough wilderness already in Idaho. More would only lock out additional people not able to handle a wilderness situation.

I am for a multiple use concept of the natural resources put here for our use and care. One segment of the population should not have preferance over another except that jobs and base economies should be protected and enhanced.

My suggestion is the implemcntation of Alternative A and writing AMP's for each allotment as soon as possible.

Yours truly,

Gorden R. Kirschenmann

Gorden R. Kirschenmann

43

Carmen, Ida, 83462
Box 12 Jan 8 - 1986

Dear B.L.M.
District Manager
In your alternatives its hard for us to say which one is right, but I tried to under stand them. the one we feel is near to what we want is F.
We are against any further wilderness
We also feel that Calves are more important then building up the Elk ~~Herds~~ or deer population.
In the past there have been good why make up a good thing I know ~~you~~ you have to comply with the over head and do some thing but please don't mess up the farmers who only have such a little bit of ground to farm in Ida any way the rest is government owned.
We better watch out because I do feel that Sierra Clubs & others is trying ~~get to~~ Control of our water for ~~new~~ Nevada or Calif. theres got to be someing behind all this control of our Rivers, no return.
Fencing isn't the answer to prevent Live stock from riparian ground.

(over)

I do feel you need to get better count on the Cattle going out on the range alternative A you said you would sell land to people I think that good. Then people will pay taxes on the land and it would help out. When the government has it we don't see any taxes. We need more ground in private ownership.

thank You

Mrs Matt Yakovac
Matt Yakovac

44

Mr. Wilfong

In reveuing the proposals for range and forest mangement plans that have been brought out for reveiw the most workable ones are Alternatives A and alternative 12 as proposed by the Forest Service and Bureu of Land Manage rent.

There needs to be a greater emphasis put on protecting existing State water rights and individual rights to such water.
These water rights should be protected over Wilderness and the Wild and Scenic River Acts.

There should be a contious on going concern for the people that are affected by any decision affecting the resources of the people in the Salmon National Forest and also Salmon Bureau of Land Management.

The wild game should be considered along with the domestic animals that use the range and forest because both wild game and domestic animals generate revenue within the community and county which helps brings in in revenue and keeps the community in the black.

How much actual tax base and disposable income is generated for actual use by the community and State Government and not by one agency.

In considering on going costs against timber, mineral and water, the wage, tax base and the well being of the citizens needs to be addressed. Anoverall effect upon not only the people of the community, there on down the line whose livelyhoods is affected, along with the taxes directly or indirectly paid by these people need to be figured in when determining the actual benifits of both alternatives.

No more wilderness should be allocated within the Salmon Bureau of Land Management, nor Salmon National Forest.

Each of the areas should be evaluated for there multiple use concept.

Roads should be kept to a minium and consideration should be given to whether to close or leave them open with consideration given for the valuse and effects of them over all.

The cost of running a Wilderness is too prohibtive to consider and the people it displaces must be a prim consideration.

Yours for multiple use thru good management.

Sincerely
A condered Ranger in Lehi County
Pat Mc Connaghy

P.S.
Therefore I would like to see our Representatives and Sentors solve this Wilderness prolber once and for all.

The proposed plan is too weak in its protection for wildlife habitat, riparian areas and primitive and semi-primitive recreation opportunities. Allowing only a small fraction of the exsits AUMs to wildlife seems unreasonable. Justification should be given for such a low emphasis on wildlife. 45-3

The proposed plan will lead to improvement on a small number of poor condition riparian areas. In my opinion, no riparian area should be left in any less than good condition. Justification should be given for not upgrading all riparian areas to good condition. 45-4

All primitive and semi-primitive recreation opportunities in the resource area are in Eastern Nevada. I do not see any justification for abandoning any of the little remaining Semi-primitive recreation opportunities in the area. The rationale given for excluding the northern portion of the USA from the Wilderness recommendation is inadequate. While the BLM land in the northern part of the USA is narrow, the Italian Peak USA which is adjacent and the nearby Beaverhead N.F. lands would give a depth and manageability to the BLM lands. There is no question that the northern part of this USA and the adjacent ~~Forest~~ National Forest lands are suitable, available and manageable as wilderness. A better justification is needed if you want to exclude the northern part of this USA. 45-5

45

3552 Baron Dr.
Knoxville TN 37923
January 9, 1986

District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon ID 83467

Dear Sirs,

Thank you for the opportunity to review the Lemhi proposed RMP and draft EIS. The very considerable effort which your staff put into preparing this document is evident. I appreciate your efforts.

I have few suggestions, comments and questions which follow.

I have to question your decision not to analyze impacts on endangered species. While it is true that endangered species are protected by BLM and critical habitats will be preserved, the Plan can improve or destroy occupied or unoccupied habitat. Therefore the impact of the alternatives on existing and possibly reintroduced populations of endangered species should be analyzed. 45-1

Utility and right-of-way corridor should also have been discussed. While the EIS assures well there there is both a need for such corridors on public land, the areas where such ~~corridors~~ developments are permitted should be determined and planned along with the other resources in the management area. 45-2

Thank you again for this opportunity to comment. I hope the comments are helpful. I appreciate all the hard work the planning team has put into this document.

Please send me a copy of the final plan and EIS. Thank you.

Sincerely,

Lance McCold
Lance McCold

Rt. 1, Box 167C
Worland, Wyoming 82401
January 6, 1986

District Manager
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Sir:

Enclosed are comment on the Lemhi Resource Management Plan and EIS. I will apologize at the beginning of this note for comments I make that are cross referenced or further clarified elsewhere in the document. Without the intimate knowledge of the entire document organization the preparers have, it is difficult at best to review a document of this complexity without error.

Comment - Draft Resource Management Plan

Page 3
Paragraph 3

46-1 You note agriculture as the economic base for the local economy. As noted on pages 3-31, 3-32 through 3-37 on the EIS, Agriculture contributes only 5-10% to the County total income — this is hardly the economic base. Agriculture approximately equals the Federal government contribution not even considering state and local government contributions. This paragraph is misleading and elevates Agriculture to a false importance to the local economy easily overshadowed by recreation and government contributions. By your own analysis, farm/agriculture is a very weak base for the local economy, whereas government and recreation are stronger. A statement to this effect should be included.

Page 8 1. Land Tenure Adjustment

46-2 Transfer of land must address another issue. Map 5-11 and map of alternative action proposals note disposal of floodplains, stream reaches, wetlands including Hayden Creek, Ferry Creek, Walter Creek, Eighteen Creek, and Eighteenmile Creek. Disposal of these wetlands conflict with BLM draft policy, executive orders, BLM manuals, solicitor opinions, and a number of court cases in Federal Courts. Unless patent stipulations and enforcement thereof assure the integrity of wetlands in perpetuity, these proposals are blatant, high visibility violation of the above. Please respond. Also, the new farm bill prohibits "sod busting". DLE action contribute to this.

Page 9 Criteria

46-3 Criteria including policy, laws, executive orders, solicitor opinions, and court cases might be noted here as criteria set by precedent for disposal of wetlands.

Page 10 Criteria (Energy and minerals)

46-4 Define "significant" relative to long term, undesirable cumulative impacts to surface resources, especially those associated with energy impacts.

Page 11 Background (First paragraph)

46-5 There is a conflict with BLM administered land contribution to Lemhi County timber harvest. You note 10%. What bearing does total BLM contribution mean when you are analyzing the Lemhi RA. Page 3-37 notes a 7% figure and this figure would appear to be appropriate here. It is difficult to locate where the 7% - 10% figures come from when current Forest Service Sales exceed BLM annual allowable cuts 20 fold. In fact many single sales exceed BLM cut several fold.

Page 11 Livestock Grazing Management
The Issue

The issue statement seem turned around. Shouldn't this be how to manage the use of the range resource by use of livestock, to meet the long term needs or perpetuation of the range resource, by meeting plant needs, species diversity and community structure? You must meet the needs of the base resource for wise management of the use of that resource.

Background

46-6 What are the specific past and present practices? I am familiar with season of use, overstocking, and the chronic problem of extending permitted grazing periods beyond licensed use conflicts. The latter have been done in house without environmental analysis on many I category allotments on downward trend. These should be noted in the document and be reflected in 5 year average HUM numbers and actual use data.

Page 11 Last paragraph - last sentence

46-7 Does "livestock use levels" refer to setting specific livestock utilization levels (limits) and stocking rates seasonally or otherwise?

Page 12 Criteria (c)

46-8 Is there a duplication of effort between Idaho Game and Fish and BLM or are the pressures on BLM to subvert the game and fish population goals relative to "consultation with public land users". Does not Idaho Game and Fish determine game population goals and subsequently to forage needs thereof through their agency's public involvement process? If so why does BLM duplicate this effort or question those goals via pressures from

individuals. If Game and Fish does not go through a public process, what specific process did BLM, BLM and Game and Fish youth, or other entity go through to generate wildlife goals from the over section of public land users. Without such a process, too often agencies like BLM subvert such efforts via special interest group/individuals pressure and misrepresent "public land users". For example one person can complain about personal elk depredation problems and consider it too many elk when he or a neighbor has concerned all the winter forage on winter ranges. I trust this is not occurring in the Lemhi RA, especially in view of the economic values associated with wildlife.

Page 12 - 5a.

Should not seasonal ranges be better described as seasonal habitats. A minor point.

Page 12 5. Background 1st paragraph

46-9 "extremely important to the local economy" is not reflected on page 3 with the strength indicated here. Perhaps page 3 should note in paragraph 5 "Also significantly contributing to the economy..."

Page 13 6. Watershed

46-10 There should be an item & noting how disposal of certain lands and the projected use of these lands impact water quality, watershed stability, or include "set aside" provisions of the latest farm bill.

Page 13. 6. Watershed
Criteria

46-11 Disposal of lands also require BLM to meet the items listed herein relating to wetlands and disposals should be noted.

Page 14 first paragraph

It should be noted heavy seasonal use at facilities occurs on campgrounds in hunting, fishing, and holiday periods even away from the river corridor.

Page 14 last paragraph, last sentence

46-12 "may" should be changed to "will". A preponderance of data support this.

Page 15 Wilderness Suitability

Background

46-13 When do the oil and gas leases expire - 1987? There are part FLPMA lease and subject to WSA restriction at present. You have the choice not to reissue these leases. Was your oil and gas EA amended to consider wilderness study areas and will leases be reissued in '87?

46-14 How significant is the timber (commercial) resource in the present of allowable cut potential and contribution to that industry in view of the long haul distances.

Page 17 3 Noxious Weeds

What has been done in the past to encourage proliferation of this problem - overgrazing? What has been done for control in the past. How significant are weed problems to present economic losses to ranchers, farmers, and general public on BLM lands?

Page 21 Why is the Birch Creek Campground facility and Birch Creek

46-16 area fishery management on the Tanana R.A. been ignored or omitted from this document. The Coal Mine also is some

developed (water) for public use. Why is it ignored.

Page 23 Range Management

Paragraph 1 Do long "term" the 20 year life of the RMP? This is a limited "long term"

It seems presumptuous to provide 52,632 AUMs long term when in most allotment your note monitoring will yet determine proper stocking rates. The 52,632 AUM figure may or may not be attainable in 20 years depending upon monitoring and subsequent grazing

46-17 adjustments and treatment need to met resource objectives.

Secondly if the 52,632 AUM point is a reality, will the 363000 AUM preference be adjusted downward or will the difference be held in suspended non-use? If the 52,632 AUM point is not met what is the contingency to deal with the promise of 52,632 AUMs you are making" and still meet all the RMP objectives and deal with the present legal active preference?

Page 33 5 Wildlife

46-18 Are there improvement needed to meet population goals, are they monitorable towards meeting these goals and maintaining them. Such improvement may be preyed upon by livestock interests but do offer greater wildlife productivity, greater harvestable surplus, and much greater economic benefit from wildlife. I support them fully as long as other uses respect the purpose of these improvements.

Page 24 Second paragraph

Of the 6,749 AUMs of forage noted how many aums of competitive livestock forage is involved? There is a critical value to compare significance of wildlife to livestock interest as well as comparing economic returns on livestock vs wildlife AUMs. Competitive AUMs let us know significance of wildlife impact on the livestock interest. I assume it will be a very small percentage of the total livestock AUMs available.

46-19

Page 24 6 and seven

It appears an alarmingly small percentage of stream miles are marked for improvement compared to stream (including fishery streams) miles available. Table B-4 indicates riparian zones in unsatisfactory condition on nearly every allotment listed. Many streams are declining in fair condition - for example BLM portions of Agency Creek are quite poor fisheries compared with 8 years ago and Terrell compared to 20 years ago. Jessica, Rose, Birch Creek and many others equal and require more a precise management to improve them. What monitoring effort will be used to ensure objectives for "satisfactory riparian and fisheries objectives are met? What monitoring method and criteria determine "satisfactory"?

46-20

Page 27 Paragraph 1

I am pleased to see fuel loading management intentions and am looking forward to implementation thereof.

Page 27 Social and Economic values

46-21 last paragraph

Wildlife economic values as per page 12 should be reflected herein.

Page 28 D. 3rd paragraph

Again 52,632 AUMs is only projected and is dependent upon monitoring and establishing proper stocking rates. You are committing yourselves to a number that are subject to future efforts dependent upon gathering data. The 52,632 may, in reality, not be attained if other RMP objectives are to be met and maintained.

46-22

Does your 5 year average use include the AUMs consumed by livestock by outside of licence extension of licensed grazing season use? If not why? These aums are difficult to track as they are not reflected in AOP base licenses. How will such extensions beyond licensed season and AUMs be handled during the interim when establishing rates, monitoring etc? Will actual use monitoring (time and numbers) be tied to utilization?

46-23

Page 34 Range Managment - first paragraph

Will legal established preference be reduced to 43,602 aums or the 63,000 - 43,602 just be held in suspended non use until monitoring reactivates up to 52,632 AUMs? Will 52,632 be increased more at a later date within the life of the plan.

46-24

Page 34 Range Management Rational

What is the economic importance (%) of public land livestock grazing

— the Jarbidge RA & Jarbidge County, the State of Idaho, and nationally?

Page 34 Wildlife

46-26 I note 1995 game projections would be met. The life of the RMP is 20 years. What about 20 year wildlife goals.

Also, AUM reservation of forage, especially on winter ranges must emphasize availability during use periods and not be buried under snow etc. How can you allocate forage on specific sites and expect it to be there
46-26 on winter for example? Will utilization limit force livestock movement off of key wildlife use areas? Otherwise you leave up to chance ~~where~~ and livestock utilization patterns the allocated wildlife forage. The substitution of forage may or may not be available in winter.

Page 36 Fisheries Management

First paragraph - To manage 5% of your fisheries streams intensively and maintain 95% in current condition (which table B-4 indicate a great ~~part~~ percentage of riparian are in unsatisfactory condition) appears very limited in scope and conflicting in purpose. What are the streams, miles, & each in various condition classes, and
46-27 what method used to determine condition classes used to determine that 95% are in satisfactory fisheries condition and yet riparian zones are unsatisfactory. I am concerned as in most BLM Districts in the west with similar rangeland conflict have a preponderance of poor & declining condition stream zones as Table B-4 indicates. I am curious how streams & riparian zones in the

vegetation and wildlife resources be impacted? You cannot relocate wildlife except range but you could severely
46-28 impact population stability by encouraging shoots of wildlife while maintaining livestock interests. This is counterproductive as ranchers can retain values by selling, etc while wildlife does not have the flexibility to get off the range except by dying. What are the emergency contingencies for wildlife and vegetation or is livestock considered dominant to these resources?

Page 48 3rd paragraph

46-29 How will you handle season of use extensions in the future. By "good ole boy" manual billing that becomes unrecorded actual use or by EA or will it be swallowed?

Page 50 What about bighorn lambing areas and mountain goat
46-30 considerations. These are missing. The Divide Trail and timber harvest could impact goats.

Page 56 Terrestrial Wildlife Habitat

How will you supply sufficient forage on specific areas of
46-31 primary wildlife use - by actual use and set utilization limit for livestock?. Where is a table indicating utilization limits by season and species groups. A 50% limit does not buy wildlife forage on specific sites. Why are there no seasonal utilization limits? Growing season grasses cannot tolerate high use removal equalling 50% of the annual growth and winter removal can tolerate greater than 50% use. Growing season key species utilization limit must be set and monitored to protect plant requirement. Also many shrubs cannot tolerate 50% removal of available annual growth. Establishment of new

symptoms of poor management that manifest themselves in — accelerated vegetation degradation. Will your monitoring, treatment / improvement to be sure objectives are being met and will you be able to make management adjustments therefrom?

46-32 Page 59 Engineering - Wildlife is listed twice -

46-33 An overall comment on monitoring grazing use is to use BLM authority (H-4130-1) & the original Grazing Act, Section 4, to set and closely monitor utilization limits to facilitate monitoring efforts, get desired data and utilize manpower at a rate that you can be monitoring more than a handful of allotments at one time.

Comments On The EIS

Page 3-2 6th paragraph - Care must be taken that cattle do not overuse or cause adverse competition for bighorn forage, grasses on sheep ranges. This problem in other areas has been or significant in bighorn declines or severe and domestic sheep conflict.

Page 3-15 Big Game - The AUMs for various species of wildlife must recognize a significant portion of this forage is not competitive forage that could be used by livestock. For example, 2800 AUMs (or deer (cattle equivalent) represent far less than 2800 AUMs of livestock forage potential. The
46-34 impact to the livestock industry is not removal of 2800 AUMs from the livestock forage base. The overall wildlife AUM total appears to represent 210% of the allocated AUMs, but owned less than 210% of the livestock forage base. This is a critical point in evaluating as well

age classes of sage, chokecherry is difficult under 50% utilization,

Page 51 Riparian key areas need to be established, utilization
46-35 limits of ~~40~~ 30% lower than 50% and monitoring must occur.

Page 52 I am greatly concerned that, as listed very frequently in Appendix Table B-4 that proliferation of water development is a panacea to solve range problems but instead create more sacrifice areas. There is a strong
46-36 case for not developing water on crucial elk and bighorn winter ranges and an adequate buffer provided. Most range degradation can be attributed to careless water development under the auspices of better distribution of livestock on overstocked ranges than ~~any~~ the most kinds of improvements.

Page 53 I am even more concerned that there is no provision mentioned about post treatment management of livestock noted under vegetation manipulation. A minimum of two growing seasons of rest is mandatory to establish vigor in the treated area forage species. After rest proper stocking rate is required of treatment as to be successful in maintaining the benefit of the treatment.
46-37 Do not follow up improvements with the same heavy livestock management that caused the problem initially! Will treatments and improvements occur before or after you determine proper stocking rates? It would seem self defeating to do improvements prior to a determination of stocking rate. Please treat the problem of proper stocking and livestock management and not the

as countering livestock industry claims of foul play. Wildlife use as so called equivalent resource is still grossly subservient to other commodity uses of rangelands. In most cases wildlife populations could ~~double~~ double and make very little difference in livestock operations if you look at competitive forage demanded.

Page 3-17 Paragraph 3 – Spring use by domestic sheep degrades sage grouse nesting success significantly and can reduce or eliminate populations over time.

Table 3-2 Why is Buck Creek not important ~~0~~ as a stream? It is a high quality fishery resource and also has significant wetlands associated with it.

46-38

Table 3-3 The listing seems very limited compared to the fisheries streams present. I have personally fished for trout in many more of the Smoky RA streams successfully. Why are you limiting the scope of the fisheries resource? Of equal note some of the streams you have listed have declined in quality a great deal in the past 10 years in terms of fish production and bank stability.

46-39

Page 3-36 Why is trapping omitted? It not only produces direct income from fur sales, but also relates to retail, transportation and services expenditures.

46-40

Page 3-34 – 29,000 cattle and 8,000 sheep (50% of county livestock) require annually about 360,000 AUMs. BLM provides a 5 year average of 52,541 AUMs which represents only 14%

46-41

of the 57% (or 87%) of the county livestock/farm income. This represents only 4.2% of the total county income is derived from BLM grazing in the Smoky RA. This entire economic analysis does not provide enough comparable, meaningful information and analysis from which any sound decision can be made. A 4.2% county contribution is insignificant. Wildlife/recreation contributes from public lands a great deal more per acre/m back into the county economy and provide the crucial water forage that maintains wildlife populations. Also wildlife resources contribute along the Montana line an ~~small~~ economic plus for the counties in Montana as well. Idaho, does winter portions of game herds that a pursued and generating income in Montana. This point has been artfully ignored. There is more than county economies at stake. Good and over conservative livestock use and management is justified ~~[illegible]~~ to protect the economic contributors to the local economy!

46-41

Pages 3-34 to 3-39 need to be in table form to compare BLM contributions to the economy i.e. livestock, ~~and~~ wildlife recreation, other recreation, timber. Show as average income per job, total county income, user income, BLM derived income, number of jobs, and % of state income need to be included for each grouping. Also, why does the section on recreation ignore non-wildlife oriented recreation and even non-consumptive wildlife recreation? There are significant user and generated dollars. Camping, sightseeing, boating, floating etc. are ignored.

46-42

It should be noted somewhere in this document that wildlife impacts to private livestock operators

can and perhaps should be mitigated by providing forage on public lands. The wildlife AUMs are far more significant to local economies than slight reductions in permittee preference related to wildlife. In fact more reductions are result of ~~more~~ unsatisfactory livestock management impacting rangelands – not to/on wildlife allocations. Most gross degradation occurs because livestock interests have taken the forage needed by wintering wildlife prior to wildlife arriving on the winter ranges.

46-42

Economic analysis continues to be extremely weak in these documents with no real organization or practical, useable results.

Page 4-5 Impacts to Range Vegetation

It is extremely hard to believe 0% and only 2% 1000 acres or so are in poor condition in the Smoky RA. Just look at riparian zones and water facilities account for that or more. The various range survey efforts in the past have indicated greater acreages than your note. There are many areas where composition is lacking (Sage with no perennial understory) and are poor range on good soils. Where there is low productivity even with fair composition of species also qualifies as poor. You have this in many areas. For example the benchlands ~~[illegible]~~ West of Tooley and east of the Smoky River old terrace note grass density so that bedded cattle are difficult to see – snow would have said and not so ~~[illegible]~~ grasse sagebrush. If you are using SCS range guidelines, which are liberal, you still have more than 0% poor range. SCS notes condition class can be ~~[illegible]~~ lowered one whole class based on ~~[illegible]~~ production even if composition is rated better.

46-43

Table B-4 page B-27 to B-61

It is apparent that current stocking rates are far in excess of land capability for most allotments. Are these rates from the 63,000 AUM preference or the current average use? I concur with the strategy of a 9 acre/AUM cutoff for initial stocking. Many areas of the RA exceed 30-50 acres/AUM. Notice range stocking rates in the vegetation types and precipitation zones where of .9-8 AUMs border on criminal abuse of public land.

46-44

Major problems on many allotments seem to have been avoided. Growing season grazing is a major problem as noted in Table B-3, but what is the strategy to cope with it. Table B-4 does not address but a few of the spring use allotments and AMPs may or may not solve the problem depending on the practices used.

46-45

The objectives and alternatives of table B-4 never include setting seasonal utilization limit to initiate movement of cattle.

46-46

Most allotments note unsatisfactory riparian conditions, but the proposed actions offer little to improve. Thus except a token mileage of streams. No provision for an initial protection for recovery and establishment of new tree and shrub seaped age classes exist on any riparian area but 90% appear to be unsatisfactory.

46-47

Water development is noted in most allotment, but conflicts

46-48 of overstocking with livestock must be addressed before new water is developed and conflicts with wildlife winter use areas (cereal ag, sheep) and new water can severely degrade such range use areas.

46-49 Are range improvements to be implemented prior to livestock adjustment? Such improvement will render monitoring data comparability useless or limit its validity

46-50 Do you have a lack of species that are to be interseeded on the various soil/range sites and precipitation zones? Is creested wheat one of these? Why?

46-51 What type of monitoring is planned to determine riparian satisfaction.

46-52 There needs to be a provision for an annual rest rotation in all allotment grazing systems in elk and bighorn winter areas and deferred or absence of livestock in breeding and calving areas during critical seasons.

46-53 What phenological stage indicates range readiness? Why?

46-54 Allotment 6237 - Why is it not I category? It has some very poor range/land ~~xx~~ conditions.

46-55 Allotment 6312, 6314 - These ignore the management of Birch Creek and associated springs/seeps/wetlands.

46-56 Allotment 6312, 6313, 6314, 6315, 6317. You will note many mounds evenly distributed in portions of the long benches in these allotment. There have noticeably greater forage and vegetation production on the mounds than on the same species on the intermound spaces. The mounds offer better water percolation and catchment, much less compaction than interspaces. The potential for ripping to break up the compacted soil but not severely damage plants would improve forage production capability. Bluebunch wheatgrass is noticeably smaller in the interspaces than on the mounds. This may be a treatment worth looking at in these allotments. This has been successful on ranges of similar nature elsewhere in the west.

Table C-1 I note wildlife numbers and forage demand is conservative based on habitat potential presented, but of particular note is that demand for wildlife by the public ~~is~~ significantly exceeds the supply, thus the economic value will continue to increase.

I also note via newspapers in that area that certain livestock operators and commodity interest groups call themselves multiple use proponents of public land as long as wildlife is not one of those multiple uses and stunt development of commodity interests on public lands is multiple use. Ignoring all of the resource values other than commodities is a philosophy contrary to FLPMA and with thorough analysis is not economically sound.

I support the idea of the Eighteenmile Wilderness as partial wilderness on the larger southern portion and the north portion with the Roadless management buffer against the forest and continental divide.

The long term erosion of productive vegetation types, riparian zones, and wildlife habitat is noted in loss of wildlife indicator species. Moose were common along the Lemhi River 40-50 years ago as were ruffed grouse and bobcat. These are gone. This planning effort is the only viable opportunity to at least stop the long term degradation on significant acreage and allow the public BLM can set the example of good land management.

I find the "long term commitment to management objectives" on these types of document rapidly erodes with ever changing personnel that refuse to "toe the line" and end up compromising the resource because that easier. No one said this is easy. I hope this is not the case in the Lemhi RA.

Thank you for allowing me to comment and for considering these comments. Document reviews burnout is upon me. Thanks.

Sincerely yours

Jeff Jenkins

Lemhi
Soil and Water Conservation District

201 North Church Street Salmon Idaho 83467 Phone 756-4261

47

SUBJECT: Resources - Lemhi Area Draft Management Plan

DATE: January 9, 1986

TO: Jerry Wilfong
Lemhi Resource Area Manager
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Jerry:

Thank you for the opportunity to comment on the Bureau's Draft Management plan for the Lemhi Resource Area.

As individuals and as a District Board we are concerned with the management of our public land resources as they are an important part of our, and our cooperator's operations.

We wish to direct our comments in two ways: 1. in a general scope then; 2. on more specific items.

First we would like to commend the Bureau Staff for a document well done. We feel this document is a very good assessment of the status of the resource area in general. We also feel, as is stated in the manuscript, the " ... general range condition is probably the best it has been in about the last 100 years."

Our first general area of comment is on the Wilderness proposal for Eighteen Mile Creek. The District's policy is to oppose any further designation of wilderness in Lemhi County. We are opposed of the

-1-

designation of Wilderness in the eighteen mile drainage for the following reasons:

47-1 1. There has not been any evidence presented in your document, that indicates a National or local need for wilderness acres in the Lemhi Resource Area. We agree that most of the eighteen mile unit meets the criteria for wilderness but feel it will continue to do so under current or other management without the wilderness designation.

47-2 2. Wilderness designation of this area would put unnecessary regulations on the grazing permittee. Although wilderness allows for grazing it becomes a secondary use, in our opinion, and more stringently regulated. Regulations by agencies are always subject to manager's interpretations. Often times these interpretations are subjective in nature and in most cases would work against the grazing permittee, rather than for them.

47-3 3. Wilderness designation of the eighteen mile area would unduly hinder the mining industry. We feel mining can be conducted to the benefit of the economics of the county, when properly planned and carried out, without affecting the environment.

4. Wilderness designation will close the door on any commercial timber harvest in the area. Although only a small portion of the proposed wilderness area is commercial timber, who is to say the timber won't be needed down the road. We propose that these lands be managed semi-motorized and non-motorized areas and not designated wilderness.

In general we can not support the preferred alternative "F". This alternative

is much to restrictive, and while a multiple use alternative, it leans far to heavily to the protectionist side of things, and restricts the livestock operation. We feel a multiple use alternative that protects the resource base from degradation and maximizes resource use, is the one that needs to be offered. We propose the following alternative.

47-4 A. LANDS: All lands suitable for agriculture would be disposed of through desert entry, or sold to private land holders. This would be the highest and best use for these lands. Suitable acreage would be based on the ability of the land to produce a crop, without degrading the soil or water resource.

47-5 Lands unsuitable for agriculture that are not manageable by the BLM, because of the location, be it access or small parcels, or what ever it is that makes it not manageable would be sold.

47-6 No Land would be acquired under this alternative. Critical land to wildlife that is in private ownership would remain in private ownership. The wildlife values on these lands should be protected in coordinated management agreements which allow for these values in the coordinated allotment management plan.

4,405 acres would be restricted from right-of-way development to protect critical cultural resources as identified under Cultural, Alternative F.

B. MINERALS: We favor alternative G's section on minerals. We are pro mineral exploration and development. However, we feel there are cases when the current uses need to be preserved over the speculation

that their may be minerals, of speculative value to be mined. Alternative "G" seems to best preserve these used without unduly restricting mining activity.

C. FOREST MANAGEMENT: We believe that the Forest Management prescribed under Alternative "F" to be the best, with the exception of the Wilderness. Our preferred alternative would use "F" as is, with the wilderness restriction deleted and added to the base.

D. CULTURAL: Our preferred alternative includes the same as Alternative "F". We feel this is essential to protect our Culteral Heritage from development and believe Alternative "F" does it best.

47-7 E. RANGE: We feel that the initial stocking level should at least be the five year average. However this is more on an allotment by allotment basis, some allotments could stand more, some could stand less. We feel the goal for the next 20 years in range should be to go from the five year average use figure of 52,541 AUMs to the active preference of 63,898 AUMs. This would be our preferred alternative.

47-8 Short term reductions would be necessary as range improvements were being implemented, but this would be done by agreement under coordinated management plans. We feel at a minimum all "I" category allotments should be developed into coordinated management plans.

47-9 Range improvements would be done on a cost benefit relationship. We feel there are at least 25,000 acres that could be improved with brush control, in addition to these acres, 5,000 to 8,000 acres need brush

control and reseeding, at least 50 springs could be developed. Pipes, reservoirs and fences should be done on an economical basis. These should be held to a minimum since these facilities are costly to build and maintain.

47-10 Riparian areas need to be considered as part of the allotment plan. These can't be separated and treated by themselves, nor can the range area adjacent to these be treated separate. We recognize there are problem areas and feel these need to be, and can be dealt with, in the allotment planning process.

47-11 We strongly feel the current range condition indicates proper management is occurring on most of the public range. Development and implementation of sound allotment management plans could lead to range improvement with the number of AUMs going from the five year average to the active preferences. We do not feel there is sufficient evidence that supports alternative "F" which is a decrease of 18%

47-12 F. WILDLIFE: We feel as a district that the current wildlife numbers, whatever they may be, are sufficient and all the current winter habitat can support. This is evident by the number of private land owner complaints about predation of private forage by wildlife. There is no way another 3,000 head of deer could be supported by the current winter habitat on public land. We propose the following number of animals:

Deer:	8,000 - wintering deer	Sheep:	200 - wintering sheep
Elk:	2,000 - wintering elk	Antelope:	2,800 - wintering antelope

for 6,080 AUMs.

We all know it is impossible to arrive at exact inventory figures for

AUMs. Therefore again we propose that wildlife be a part of allotment management plans, and then where areas of conflict exist between livestock and wildlife, those be resolved in the planning process.

47-13 Fences would only be modified if it were proven that a need existed. Ie. it was demonstrated that a particular fence was impeding migration. We feel that most fences are only a small nuisance to wildlife. Again fences and fence specifications would be part of the allotment management plans.

G. WATERSHED & FISHERIES: We would include in our alternative the watershed and fisheries portion of Alternative F. There is a need for riparian management but only as a part of an overall management plan.

We question the statement that 50% of the AUMs come off 2% of the land base (riparian area). This would mean 26,000 AUMs are coming off of 9,200 acres. Or the riparian zones are producing 2,300 pounds per acre. We question this because:

1. If there is 9,200 acres along 97 miles of stream then the average width of the riparian zone along the streams would be 790 feet or about 95 acres per mile of stream. We feel the average width would

47-14 be closer to 200 feet or 24 acres per mile.

2. 2,300 pounds per acre is an extremely high figure. Irrigated acres along the Lemhi are producing around 3,000 pounds per acre. This is cleared, with irrigation and no fertilizer. For the most part we feel a 1,200 pound figure would be a closer figure to the realistic situation.

Therefore, if we figure 97X24 = 2,328 acres of riparian habitat along the streams, plus an estimate of 1,000 acres in other riparian areas, we would have 3,300 acres of riparian habitat. 3,300 X 1,200 = 3,396,000

pounds times .50 untilization equals 1,980,000 pounds of feed divided by 800 pounds per AUM equals 2,475 AUMs of feed in the riparian zones.

47-14 63,000 - 2,475 = 60,525 AUMs ÷ 6,000 wildlife AUMs = 66,500 AUMs needed from 456,000 acres or 6.8 acres per AUM. 6.8 AUM would mean the average production per acre, of forage, would be around 117 pounds.

47-15 If we use Wyoming Sage-Bluebunch Wheat (B-12 ppt) habitat type, as an average for the county. This site produces about 400 pounds in good conditions. 60% of this is grass or 240 pounds, then 50% of this would be 120 pounds of feed available. This would indicate that the 6.8 acre would be a realistic figure to plan for and provide forage for the 6,300 AUMs for livestock and 6,000 AUMs for Wildlife.

We feel our preferred alternative allows for the following:

1. Disposal of lands that are not manageable or are better suited for agriculture.
2. Does not acquire any private land.
3. Eliminates wilderness designations in the eighteen mile area, but manages the area to retain the wilderness values.
4. Provides maximum protection for cultural and recreational values.
5. Provides opportunity for mineral exploration and development, yet protects critical areas from surface disturbance.
6. Allows for maximum forest management.
7. Continues the range improvement and provides for better management of rangeland habitat.
8. Stabilizes wildlife at existing population for the most part.
9. Improves riparian management with the allotment management plans.

SPECIFIC COMMENTS:

47-16 1. Page 13, item 6. This issue statement leads one to believe that all riparian area degradation is due to livestock grazing! Are there not other factors that influence riparian areas such as flooding, wildlife, fire, etc?

47-17 2. The first paragraph states there is a need to identify acres for access acquisition for public recreation. Is this the role of the Federal Government to acquire private land right-of-ways for public use? Wouldn't this be a more appropriate role for private groups to acquire their own access?

3. Page 17. We applaud the recognition by the Bureau that control of noxious weeds is an important management concern!

47-18 4. Page 22. Item 1. Disposal. This states 5,600 acres would be acquired - 4,495 would be sold or traded to private or public owners. Where would the 1,105 acres come from that will make up the difference? It should not be the role of the Federal Government to acquire additional lands unless it is in the general public's best interest! We don't feel any of the land proposed to be acquired is in the general public's best interest!

47-19 5. Stated in your plan, there is 30% of the range in fair and poor range condition or approximately 138,000 acres. Your preferred alternative states only 22,471 acres would be improved to good, this is only 16% of the 30%. We feel if you were to implement alternative "F" that there would be at least 50,000 if not more of the fair and poor range improved to good. Brush control and seeding alone in the alternative provide for 26,700 acres of improved range.

Until allotment management plans are developed there is no way to assess how many acres of brush control, seeding, pipe etc., needs to be

implemented for range improvements. Nor is it known what is actually feasible.

The draft management plan should be written with a goal of improving 50,000 acres of fair and poor condition range over the next 20 years.

47-20 6. Page 24. Shifting of sheep to cattle in the Little Eight Mile to to Eighteen Mile Creek area. Is this consistent with the plans of the operator or operators? Is this consistent with the exchange in use policy stated in the standard operating proceedures?

47-21 7. Page 28. The first paragraph under D states the preferred alternative meets or exceeds the demand for livestock grazing. Is this true? The demand for livestock grazing is 63,000 AUM. The preferred alternative only allows for 43,000 to start with and then builds to 52,000 over the next 20 years.

8. Page 30. Item "I" states the preferred alternative recommends that 14,796 acres be designated wilderness in the Eighteen Mile drainage. We feel it is mandated by congress that the Bureau assess acreage suitable for wilderness designation. We agree that the acreage identified meets the wilderness criteria for designation.

47-22 What we con't agree with is the Bureau recommending it as wilderness. Unless the Bureau feels this is the only way to protect critical resource values or that there is overwhelming public demand for this area to be designated as wilderness, then it should be left up to the public if they want wilderness designation in this area. No evidence is presented for either case in the document. Therefore, we feel justified in recommending a semi-motorized and non-motorized status for this area, or

or management as is.

47-23 9. Page 3-16. First paragraph indicates 37% of the elk winter range is in less than satisfactory condition. What does this mean? These areas need to be identified and a reason given why the classification is less than satisfactory. How will the preferred alternative improve these? What percentage will be improved? What will be the cost? Who pays the cost?

47-24 10. Page 3-16 under deer. It would seem from this discussion that poor and fair ecological condition is good for deer. The statement also does not justify the proposed alternatives 35% increase in deer numbers.

47-25 11. B-11 Item 3. Increased grazing, when accompanied by range development, would change existing range trend. Is this always true? What is the documentation or research literature to support this assumption?

47-26 12. B-11 second paragraph. What documentation supports the range and wildlife staffs feeling that the majority of allotments were not able to provide enough forage for wildlife needs? It would seem that if 70% of the area is in good range condition that this statement is not true.

47-27 13. B-11 until allotment management plans are developed for the "I" allotments no stocking levels could be set. The majority of these allotments in the "I" catagory have cattle distribution problems. It does not seem justified to make reductions until plans are developed to solve the conflicts in each allotment.

47-28 14. Page 41. We take exception to the first criteria in determining agricultural land suitable for development. Because of our growing season alone, there are no class I or II soils in Lemhi County. Many of the ranches in Lemhi County are using class IV land to grow forage crops on. Becuase of the limited crops (hay or small grain) they are able to use these class IV lands without harming them. There are probably parcels that are suitable to grow forage or that are 70% to 80% class IV. We propose that each 40 acre parcel be classes as suitable if they are 80% class IV or better, rather than the criteria used on page 41.

47-29 15. Under the standard operating proceedure for Energy and Minerals, (Page 43) this section should spell out the standard procedures for operating and reclaiming mined lands.

47-30 16. Page 53. The amount of soil erosion that is tolerable is more dependent on the soil type than the cover. Our information tells us there is a range between 1 and 5 tons that could be lost, depending on the soil type. Use of the soil survey should be made to predict the allowable loss of a soil. This should be a part of the management plan.

47-31 17. Minimum stream flow for Big Timber Creek. There is not sufficient water to fill all decrees in Big Timber Creek in the latter part of the year. To get a minimum stream flow the Bureau would have to acquire several private water rights. We don't feel this would be a beneficial use of the water for the taxpayers. This proposal should be dropped from the plan.

Dennis R. Studebaker, Chm

Dennis R. Studebaker, Chairman
Lemhi Soil Conservation District

DRS/ras

Jan 12, 1986

Dear Sir,

I would like to voice my support for a managment plan to return BLM land to more of a multiple use concept. Cattle grazing, and cattle overgrazing, has long been the primary use of BLM land in the Salmon area. Unfortunately, often at the expense of other users including wildlife.

Alternative F sounds as if it gives more than a fair shake to cattleman and hopefully will be a beginning for a long needed rehabilitation of lost wildlife habitat. I base this on the following observations:

1. Stockman who can only make a profit by continually overgrazing public land are walking a financial tight rope and probably should not be in the business anyway.

2. Cattle do destory riparian habitat and most stream bottoms in the Salmon area are in disgraceful condition. Seeps and small tributaries, which are often out of the publics view, are the worst examples with many of them trampled out until they run mud year round.

3. The demand for big game far exceeds supply and is projected to continue this way far into the future. This is supported by the fact that most elk and antilope hunts are still on a controlled hunt basis only on most units in the Salmon BLM District. The odds of drawing a permit to hunt big game in these areas remains low. The main limiting factor on big game is still winter range. Much winter range falls primarily on BLM land. When all the grass has been stripped by cattle before they even reach their winter range it is no wonder elk are forced to move on down to hay stacks. Burning and spraying sagebrush stands that in deep snow years may be the only food available to big game is also a poor practice that benefits cattle at the expense of wildlife and other users.

4. Replacing existing range fences with a 38 inch 3 strand fence to permit wildlife passage is also a good plan. Sure, cattle will go through about any fence if pasture contains no grass and good grass is available on the other side. This problem reflects back to the fact that many allotments are completely grazed off before cattle are moved.

To suggest these needed measures in the face of some of the very vocal cattleman in Lemhi County took nerve. To carry out these measures will take even more nerve. I hope in the future we can manage the public land for the best benefit of all the public.

Yours truly,
Jane Abbott

Jane Abbott
RT. 1 Box 227 D-5
Salmon, Idaho 83467

49

District Manager
B L M
Box 430
Salmon, Id 83467

Gentlemen:

I support alternative "F" with these items to be considered.

With no reduction in present B.L.M. levels and active improvement and maintenance being done so our level can be returned to a level of 63,398 A.U.M's and more as range is improved.

There should be no increase of present level of wildlife until the Fish and Game shows they can manage what they have now. They must take the winter feeding pressure off the rancher and land owner.

49-1 Riparian fencing should be done only as a last resort after all other alternatives have been exhausted.

No wilderness should be allocated within the B.L.M. boundaries.

You must remember that the domestic animals that we the B.L.M. are the real revenue generating agent within the community. A healthy livestock industry will keep the community and schools in the black.

When making range improvements the BLM should consult and take the advice from long time residents that know the land and how water runs especially in the question of springs development. A college degree does not make one an expert in any certain field.

Yours for better public lands through Multiple use

Sincerely

Dan & Eileen French
Rt. 1
Box 94
Salmon, Id
83467

1-14-86

50

Wilderness River Outfitters
And Trail Expeditions, Inc.
P O BOX 871 — PHONE (208) 756-3959
SALMON, IDAHO 83467

January 9, 1986

Jerry Wilfong
District Manager
BLM
Salmon, Idaho

Dear Jerry:

I support your preferred alternative for the Draft Resource Plan. It is my feeling we have to look further down the road than the next few years. The range resource has to at least be holding its own or improving, not a continuous decline in range condition.

Also wildlife cannot take a backseat to domestic stock. Big game is particularly dependent on winter range on BLM lands. Certainly there will be bad winters which will cause problems but on a long term basis the Game is dependent on winter range forage at lower elevations on BLM ground.

I have personal knowledge of many problem r/parian areas on the BLM ground - some are in really poor condition. It appears to me the longer the conditions persist the more expensive it will be to rehibilitate these areas.

If the cost of managing the range is higher than generated revenues then the BLM could consider allowing the grazing permittee to manage his own allotment (with no grazing fees paid) under the condition that periodic range inspection show good or improving range condition and significant feed available for wildlife grazing. If the permittee failed to meet criteria the permit would then be reissued to a new permittee. A different approach but it may be worth consideration.

Thank you for your time.

Sincerely,

Joe Tonsmeire

51

Fran Tonsmeire
Box 871
Salmon, Idaho 83467

District Manager
BLM
Salmon, Idaho

Dear District Manager:

I am writing in support of your preferred alternative F for the Lemhi Resource Plan. It seems to favor the long term impact on the range and wildlife instead of the increased short term benefits.

I am particularly concerned with the prime elk and deer winter range. Since adverse impacts on the timber are only slight I don't think we should risk disturbing the game habitat and fisheries with additional road in crutial areas. Displacement of elk and deer due to roaded areas or lack of range feed seems only to cause problems in other areas. Example: elk raiding ranch hay stacks. Also with insignificant long term impact to livestock grazing, I feel the benefits (range vegetation, wildlif habitat, fisheries and recreation) far outweight the adverse impacts.

I do support your wilderness recommendations as a means of permanantly protectly vital areas.

In closing, I feel your direction in either holding or improving range conditions is essential in the long range planning. To me, short sighted management is mismanagement.

Thank you for your efforts in preparing this plan and good luck.

Sincerely,

Fran Tonsmeire

52

January 12, 1986

District Manager
BLM
Box 430
Salmon, Idaho 83467

Dear Sir:

I support Alternative A with some exceptions. I feel that the present stocking level should be maintained unless it can be proven that this level is causing severe damage to the range. I also feel the the BLM lands should be managed for Multiple Use.

Some general comments about Alternative F are as follows: I am against any further Wilderness designation for Public Lands in Idaho. I feel that the character of an area can be maintained thru management rather than designation. Use of road closures and rehabilitation are examples of maintaining the area's values.

I feel that most of the wildlife winter range is now at its carrying capacity. This is especially true on the Lemhi drainage. It would make little difference if all of the cattle were off the range, because during a heavy snow year the game would move to private land and cause great problems. There is no mention of the amount of big game that uses private land already on a year around basis. If more are pushed onto private land the land owners will have to eliminate some or go out of business.

The Federal Government already owns to much land and should never be allowed to aquire private land.

52-1 I don't feel that there is a need to fence riparian areas, I think the majority of the damage is caused by high water and cloudbursts rather than livestock. Instream flow is not a matter for the Federal Government, it is a state right.

Sincerely
Bruce L. Mulkey

54

COMMITTEE FOR IDAHO'S
HIGH DESERT
P.O. BOX 463 BOISE IDAHO 83701

January 13, 1986

Jerry Wilfong
Lemhi Resource Area Manager
Box 430
Salmon Idaho 83467

Dear Sir:

Thank you for the opportunity to comment on the Lemhi R.M.P. It is a nicely put together document. We appreciate its high cartographic quality, and the breakdowns of grazing allotments by area within and without wilderness study areas.

We first wish to generally discuss the various alternatives. Alternatives B, D, and E would have unacceptable adverse impacts on wildlife, soils, water quality, fisheries, riparian habitat, and in the case of B, on vegetation.

Alternative C has many attractive qualities. It's major increases in wildlife populations, riparian quality, range vegetation quality, fisheries, and its adoption of the full WSA all fit very well with our membership's goals. We cannot, however, accept its impacts on the local economy. Continuing declining demand for beef is hurting the livestock industry as it is. We do strongly support Alternative C's call for the full 24,000 acre wilderness and for improved riparian quality.

We generally support Alternative F, your proposed alternative, but with several changes. Our comments follow.

We support wilderness recommendation for all 24,922 acres of the Eighteenmile WSA--plus the 640 acres in the State of Idaho's Section 36, T14N, R28E (acquired by exchange). With this addition, we feel you can have a highly manageable wilderness boundary. This area would provide additional safe habitat for bighorn sheep, as well as protect elk winter range, elk breeding area, and deer winter range. Plus, it would protect wolf and raptor habitat. It also would provide additional wilderness protection to a stretch of the Continental Divide Trail. It would provide primitive non-motorized recreation in a larger percentage of the Resource Area. We believe the GEM study shows that there is no special mineral potential in the northern area worthy of excluding it from wilderness designation.

54-1 We support greater reductions in grazing in this specific area than your R.M.P. calls for. The Eighteenmile Creek way should serve as the major access corridor to the wilderness area for families, the elderly, and the infirm. It travels through lands which are presently in very poor condition due to

1

53

January 12, 1986

District Manager
BLM
Box 430
Salmon, Idaho 83467

Dear Mr. Walker,

Alternative A is the best choice for the following reasons: Ranching is the mainstay of Lemhi County as it has been for over 100 years. These are economically tough times for everyone, but especially for ranchers and farmers. I feel that to cut livestock grazing to increase deer and elk population would be unjustified. For many ranchers it could be the difference between profit and loss. We already have more deer and elk than we have winter feed for.

The cost of administering the preferred alternative would be much too costly. Most of our problems with overgrazing can be overcome with a few fencing and water projects, at a much lower cost.

Sincerely yours,
John Amonson Jr.

John Amonson Jr.
Box 51
Lemhi, Idaho 83465

54-1 overgrazing. Some of the best potential campsites which could serve as base camps for day hikes up canyons to the Continental Divide, are in poor condition and may be getting worse! The general comments in your Chamberlain Creek allotment discussion in Appendix B-4 (page B-55), do not seem to go far enough to ensure a high-quality recreation experience in Eighteenmile Creek. Nor does the very minor (3%) long-term grazing reduction from actual use seem adequate. We support a minimum 50% reduction in grazing along Eighteenmile Creek. We do not support distributing this livestock use outside the creek corridor: the away-from-the-creek areas should be maintained in the same good condition they are in now. We urge you to move this intensive livestock use out of the WSA.

These steps are not urged simply because we support wilderness for the area; they are urged because this is the Resource Area's only area of non-motorized semi-primitive primitive and primitive recreation opportunity. Foot and horseback travellers are much more aware of grazing impacts (i.e. cowpies and heavily utilized range), than are ORV users. They deserve a less heavily grazed area to walk through on this 459,000-acre Resource Area.

54-2 We feel your discussion of noxious weeds is deficient. The conclusion of paragraph one on page 3-13 should be changed to read: "Future efforts will involve using any biological or mechanical control methods available before developing any local control programs that would allow for use of herbicides where necessary. Areawide control programs using herbicides are the least desireable step, and would only be used if more acceptable measures were unavailable or proven ineffective."

54-3 We are unclear over exactly which steps result in such a great increase in elk in Alternative C. Is it the reductions in livestock grazing, or the additional 4300 acres of timber set aside for elk thermal and security cover? Also, is this extra land in timber that can be utilized by the Salmon mill, or must this type of timber be sent over to Montana? If this is lodgepole, and if this reserved timber acreage would significantly help elk, then we support additional timber reserve over Alternative F's recommendation.

Again, thank you for the opportunity to comment on your plan.

Sheldon Bluestein
Secretary

2

JoAn E. Wood
DISTRICT 20
CLARK, CUSTER, JEFFERSON
AND LEMHI COUNTIES

HOME ADDRESS:
ROUTE 1, BOX 21
RIGBY, IDAHO 83442
PHONE (208) 745-7846

55

COMMITTEES:
EDUCATION
RESOURCES AND CONSERVATION
HEALTH AND WELFARE

House of Representatives
State of Idaho

District Manager
B L M
Box 430
Salmon, Idaho 83467

Dear Sirs:

After talking to many of my constituents, I will convey their feelings about the Lemhi Resource Management Plan.

They feel and I agree, that we cannot support the Preferred Alternative. We are many good reasons why we cannot support this Alternative, some of them are,

1- It is economically unsound and unfair to expect ranchers to pay for the cost of improving wildlife and recreation.

56-1 2- We are against any increase in the amount of Wilderness in our State, especially in our Lemhi Resource area. It is not economically sound for our area either. We just cannot afford this alternative. It increases 1000% the cost of the existing alternative A.

3- We already have more game population than we have winter feed for. It is not a question of private stock going on to public land but wildlife coming out private ground in many areas to intrude on private haystacks etc.

4- Preferred alternative unjustifiably attempts to cut livestock grazing for the benefit of wildlife and recreation.

JoAn E. Wood
DISTRICT 20
CLARK, CUSTER, JEFFERSON
AND LEMHI COUNTIES

HOME ADDRESS:
ROUTE 1, BOX 21
RIGBY, IDAHO 83442
PHONE (208) 745-7846

COMMITTEES:
EDUCATION
RESOURCES AND CONSERVATION
HEALTH AND WELFARE

House of Representatives
State of Idaho

5. Forage allocation for wildlife is not quantifiable with any degree of accuracy at this time.

6. Fence standards need modified to meet each situation.

7. Most of the problems caused by early spring grazing could be handled with an allotment management plan where the units could be rotated or in some instances reseeded.

8- Instream flow on Big Timber Creek should not be a B.L.M. consideration.

9 Alternative A takes land out of government ownership without adding any more. The preferred alternative is merely going to exchange lands; We think government should stop

56-1 acquiring land, with few exceptions.

10. The preferred Alternative F emphasizes recreation and aesthetic values too much over commodity production on public lands.

11. Fencing to prevent livestock grazing is not the answer to deteriorating riparian habitats.

We would like to support and recommend to you Alternative A with two ammendments. We think these should be an ammendment recommending active preference continue to be the stocking level. also AMP's be developed with necessary improvements to operate under the principles of Multiple Use and Sustained Yield. Sincerely Yours Rip John E Wood Dist 30

DANE H. WATKINS
DISTRICT 31
BONNEVILLE, JEFFERSON, MADISON,
FREMONT, CLARK, BUTTE, CUSTER,
LEMHI AND TETON COUNTIES

HOME ADDRESS:
2242 SOUTH BOULEVARD
IDAHO FALLS, IDAHO 83402
RESIDENCE (208) 522-4895
OFFICE (208) 523-0800

56

COMMITTEES:
CHAIRMAN
LOCAL GOVERNMENT AND TAXATION
FINANCE

Idaho State Senate

CAPITOL BUILDING
BOISE

January 9, 1986

District Manager
BLM
Box 430
Salmon, Idaho 83467

RE: Salmon National Forest Plan

Gentlemen:

We support Alternative A with two amendments. 1. Active preference continue to be the stocking level. 2. AMP'S be developed with necessary improvements to operate under the principles of "multiple use" and "sustained yield".

We cannot support the 'Preferred Alternative' for the following reasons:

1. We simply cannot affort it. It costs in excess of one thousand (1000%) percent of the existing Alternative A.
2. We are against any further wilderness.
3. We feel it is economically unsound and unfair to expect ranchers to pay for the costs of improving wildlife and recreation.

56-1 4. It unjustifiably attempts to cut livestock grazing for the benefit of wildlife and recreation.

5. Our present game population is more than we have winter feed for.
6. Forage allocation for wildlife is not quantifiable with any degree of accuracy at this time.
7. Fence standards need modified to meet each situation.
8. Most of the problems caused by early spring grazing could be handled with an allotment management plan where the units could be rotated or in some instances reseeded.
9. Instream flow on Big Timber Creek should not be a BLM consideration.

10. Alternative A takes land out of government ownership without adding anymore. The preferred alternative is merely going to exchange lands. We think government

56-1 should stop acquiring land, with few exceptions.

11. The preferred Alternative F emphasizes recreation and aesthetic values too much over commodity prodution on public lands.
12. Fencing to prevent livestock grazing is not the answer to deteriorating riparian habits.

Sincerely,

Dane Watkins
Senator

DW/pc

57

United States Department of Agriculture | Forest Service | Salmon National Forest | P.O. Box 729 Salmon, ID 83467

Reply to: 1920

Date: January 13, 1985

Kenneth Walker
District Manager
Bureau of Land Management
Salmon District Office
P. D. Box 430
Salmon, Idaho 83467

Dear Ken:

We have reviewed the Draft Reaource Management Plan and Environmental Impact Statement for the Lemhi Resource Area and have the following comments:

57-1 We suggest that you avoid establishing a policy in the Plan to always use three-wire fences. We believe the determination of what type of fence to use should be based on site specific conditions and the purpose of the fence. We feel that to establish a blanket policy for one type of fence will result in future problems with livestock management where a fence other than standard should have been used.

There are numerous allotments on which we share boundaries. As allotment management plans are developed for these areas, we encourage close cooperation between the BLM and Forest Service in order to achieve the best coordinated resource management.

Thank you for the opportunity to review your proposal.

Sincerely,

/s/ RICHARD T. HAUFF
Forest Supervisor

59

439 Styner Avenue
Moscow, Idaho 83843
January 11, 1986

Mr. Kenneth G. Walker
District Manager, Salmon District
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker:

I appreciate the opportunity to review the Draft Lemhi Resource Management Plan and Environmental Impact Statement. The following comments concern the need for special areas, such as research natural areas, to be included in the Plan for the Lemhi Resource Area.

Unfortunately, the Idaho Natural Areas Coordinating Committee did not have the time or opportunity to work with Salmon District personnel in identifying and searching out relatively undisturbed areas in the Lemhi Resource Area that could be set aside as ACECs or research natural areas to include a number of needed vegetation types and other situations. I was pleased to see on page 19 of the Plan the statement, "There are no identified ACECs in the resource area. If such areas are identified in the future and their resource values cannot be protected through other management techniques, ACEC designation will be proposed and a plan amendment completed for the Lemhi RMP". We believe that it is important to identify, establish, and protect areas which will include needed types for research and education purposes, as baseline or reference areas, as gene pools, and for monitoring purposes.

Some of the needed types that possibly could be included in research natural areas in the Lemhi Resource Area are the following:

Hotsprings sagebrush/Idaho fescue h.t.
Black sagebrush/Bluebunch wheatgrass h.t.
Black sagebrush/Idaho fescue h.t.
Black sagebrush/ Colorado wildrye h.t.
A good example of a characteristic alluvial fan with its mix of vegetation.

There are other possible types. We hope that the Idaho Natural Areas Coordinating Committee and The Nature Conservancy can work with Salmon District to identify candidate areas.

Sincerely

C. A. Wellner
Charles A. Wellner
Idaho Natural Areas Coordinating Committee

FS-6200 28(7-82)

58

Turner Ranch
Star Route 1, Box 55
North Fork, ID 83466
11 Jan 1986

District Manager
BLM
Box 430
Salmon, ID 83467

Gentlemen:

I have reviewed your various Alternative Management plans.

Principles of Multiple Use and Optimum Sustained Yield are vital to those in Lemhi County.

Your Prefered Alternative F appears to be a well thought out compromise for most of the various interests evolved. With downward budget trends it appears that funds will not be available to adequately implement Alternate F.

Cattlemen of the Lemhi Valley area favor alternative A, considering implemation costs in relation to economic returns.

Wilderness :
I do not favor any more. The present restrictions against the use of chain saws to maintain needed trails and facilities hampers foot and horse travel plus causing increased management costs for needed maintenance. Vital economic returns from Wilderness do not appear to to justify more Wilderness.

Wild Life: An important economic resource.
Those who harvest this resource should carry the expense of good management practices and requirements so as to have adequate game, winter feed etc.

Lack of effective Predator control has created economic losses in Game and for those raising Sheep.

Roads into Game areas should have limited vehicle access, be closed during Hunting seasons and or during critical periods. Access at other periods for fire wood and timber will contribute to the overall economy.

Other Recreational uses:

Management should not be a burden to other users of the land.

Fenceing:
Past & Future considerations should not be a burden to the Cattle industry.

The poor economic condition of Lemhi County requires that Plans and Alternatives of Land Management consider cost factors in relation to maximun returns to be realized over the plannd time period.

Sincerely, Winfield S. & Betty J. Turner

Win & Betty Turner

January 13, 1986

60

District Manager
BLM
Box 430
Salmon, Idaho 83467

Gentlemen:

I am against Preferred Alternative F for the following reasons:

1. We don't need any more wilderness. It is a waste of land, that only a few get any benefit from. The wilderness that we have now is fine and enough. Wilderness does not help support the local community. It is for a few outsiders that don't have to make their living here.

60-1 2. The nine acres per A.U.M. is unfair to the ranchers. You say you are going to make an allotment by allotment study to set grazing adjustments. But if we accept this nine acres per A.U.M. it leaves the door open for the B.L.M. to do whatever you want to. You may be sincere in what you say, but whoever replaces you may not.

60-2 3. We don't need any more wildlife. As I understand this is one of the main reasons for having the nine acre per A.U.M. , is to make more room for wildlife. It is unfair to cut the livestock grazing to support more wildlife, which the winter range can't support. This has been proven this winter that the wildlife population is at its maximum. If I understood correctly, Tom Parker of the Fish & Game admitted this in the meeting of January 7, 1986. Having more wildlife would also put more hardship on the farmers and ranchers with wildlife moving in on the haystacks in winter and fields in the early spring grubbing the new growth of grass and alfalfa. Elk are carriers of bangs, which can infect cattle, like any other disease it is more prevalent when populations get overcrowded. Wildlife also doesn't support the local community as much as cattle do.

60-3 4. The fence standards need modified to meet each situation. My experience with 3-wire fences is that there is no advantage over 4-wire fences concerning wildlife. The first two years we put in a 3-wire fence, it was torn up just as much as 4-wire fences are the first 2 years. Through the years, I have noticed that it takes a couple years for wildlife to get accustomed to a new fence. 4-wires don't hinder wildlife any more than 3-wires. The 3-wire fences don't hold cattle as well as 4-wires; causing more riding & fence repair for the rancher.

5. Cattle deteriorating riparian habitats has not been proven. Why go through the expense & inconvenience of fencing streams because of some bias studies. Some studies have shown that cattle may even benefit riparian habitat. Why penalize the ranchers for something that is not proven.

60-4

I support Alternative A with two amendments.

1. Active preference continue to be the stocking level.
2. AMP's be developed with necessary improvements to operate under the principles of multiple use and sustained yield.

Sincerely,

Rodger Swanson
Route 1 Box 45
Salmon, Idaho 83467

state very rapidly simply by lack of use. We support wilderness designation of lands adjacent to the Continental Divide Trail as a permanent enhancement to the recreation value of the trail. The historic significance of this trail the the future importance of it justify protection of a natural buffer. We support a wilderness recommendation of all the 24,922 acres of Eighteenmile WSA and the State of Idaho's Section 36, T14N, R28E.

The full wilderness recommendation we support would provide protection for elk, bighorn sheep, and deer winter range as well as assure protection for gray wolf and bald eagle. Without the expanded recommendation we do not believe that these two threatened & endangered species' habitat will be maintained.

61-2

Fisheries and Water Quality

Improving habitat on only 3.00 miles of McDevitt Creek is an insufficient goal resource area wide. Improving water quality on only 2.25 miles on Devenmile Creek is likewise far too low a mileage goal when so much of the nearly 30 miles of fishable creeks are in good to poor condition and are threatened. Maintaining 94.7 miles of stream in its present condition is too low a standard.

61-3

Water quality continues to be threatened by the failure of reforestation efforts. The plan states that this failure is in great part due to the impacts of grazing in recently harvested sites, yet gives no definitive resolution to this problem. The plan should specifically address the timber management program in relationship to reforestation and watersned degradation.

61-4

Riparian Zones

Although we commend the plan for proposing affirmation action in regard to some riparian zones, we cannot support the goal of maintaining an overall static trend in 94.7 miles. Since the majority of riparian zones in the resource area are typically dominated by highly erosive soils, greater attention should be given to season and degree of grazing activity.

61-5

61

THE WILDERNESS SOCIETY

NORTHERN ROCKIES REGION

January 21, 1986

Ken Walker, District Manager
Salmon District - BLM
PO Box 430
Salmon, Idaho 83467

Re: Lemhi RMP/DEIS

The Wilderness Society appreciates this opportunity to comment on the Lemhi plan and supporting data and analysis. We believe that the direction indicated by the plan is by-and-large good, however we do not believe that it will allow these public resources to fully recover from past activities that have caused resource degradation.

Although a viable population of gray wolf does not now exist, the habitat potential is there and multiple sitings indicate wolf presence. Without the full wilderness recommendation we support, we do not believe this species will be provided for as required by the Threatened and Endangered Species Act. Likewise, we do not believe that adequate justifications for perpetuation of fair and poor range condition or full protection for riparian zones were presented.

Wilderness

We support the plan recommendation for protecting 14,796 acres of the Eighteenmile WSA as wilderness, but it is not enough. The WSA values include outstanding opportunities for solitude, and unconfined, primitive recreation. It is adjacent to the Italian Peaks, a magnificent area of public land administered by the Forest Service. We do not agree with your rationale for determining non-suitability for the remaining portion of the WSA because of adjacent National Forest failure to recommend wilderness for the contiguous forest that the remaining portion of the WSA not be recommended for wilderness as well is insufficient. Ways to deal with the management difficulties you mentioned were not addressed, and recent uses have not degraded the area beyond wilderness qualifications. Indeed, you mention that the jeep trails that do exist would return to a natural

61-1

455 WEST IDAHO STREET, SUITE 302, BOISE, IDAHO 83702
(208) 345-8353

Grazing

Livestock production does not outrank wildlife, fisheries, recreation, watersned and biological diversity in the multiple uses of this land. No longer can this area be managed as a predominantly range production resource. We commend the plan for its proposals to reduce livestock grazing when it causes degradation to the environment, but believe the plan should go further. Range condition should not be allowed to sink below a good condition, reseeding in the case of fire or range management should never be structured so that wildlife forage is sacrificed for livestock production forage. Such low long-range grazing reductions will not, in our view, improve range and riparian conditions from current poor conditions found throughout the RA but especially along Eighteenmile and Chamberlin Creeks. A long-range reduction in these two areas should approach 50%.

61-6

Although community stability for the livestock industry is an important consideration, the public's obligation to assure that industry is profitable at its current size does not extend to the destruction of other valuable resources. This is especially true when the economic value of domestic livestock production involves huge public subsidy compared to the rising positive economic values of wildlife, fisheries, water quality and recreation. Specifically, the plan must assure that the range condition, especially in the lower elevation, will show an improvement in trend from the current fair and poor condition and no degradation to the resources I just mentioned. A reasonable balance must be found where the grazing level can be maintained without destroying the ability of the environment to continue producing these other resources.

The plan does not present to the public a realistic picture of grazing economics for the area. What is the real net gain or loss to the public for managing the area for livestock at the expense of wildlife, fisheries, water and recreation.

61-7

Thank you for this opportunity to comment.

Sincerely,

Jane Leeson
Regional Assistant

62

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO ATTN OF: M/S 443

Jerry Wilfong
District Manager
Bureau of Land Management
Salmon District Office
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong:

The Environmental Protection Agency (EPA) has reviewed the draft Lemhi Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS) prepared by your staff. Thank you for providing us with additional time for our review. The Draft EIS evaluates alternative schemes for managing the resources on the 459,566 acres of the Lemhi Resource Area, Idaho. The EIS preferred alternative is expanded into a planning document in the draft RMP. The Draft EIS/RMP also includes a preliminary legislative EIS for management of the Eighteenmile Wilderness Study Area (WSA). Our detailed comments on all of these documents are enclosed. Our review was conducted in accordance with the National Environmental Policy Act (NEPA), and our responsibility under Section 309 of the Clean Air Act to determine the acceptability of proposed federal actions in terms of environmental quality, public health, and welfare.

We have rated the draft RMP/EIS as EO-2: Environmental Objections; Insufficient Information. A summary of the EPA rating system for draft EISs is enclosed for your reference. This rating reflects our primary concern that water quality and beneficial uses are not adequately protected under the EIS preferred alternative (and therefore the proposed RMP). We would support the redesignation of Alternative C as preferred in the Final EIS and its selection for implementation. This alternative better protects water quality by setting standards for livestock forage use in riparian areas. 62-1

Similarly, we have rated the EIS for the Eighteenmile Wilderness Study Area designation as EO-2 also. This rating results from the fact that none of the alternatives, except designating the entire area as wilderness, would comply with federally approved state water quality standards. As you will remember, the Clean Water Act requires that federal agencies comply with these standards. Thus, at this time the only alternative which BLM may currently select for implementation would be the all wilderness alternative.

-2-

Thank you for the opportunity to review the Draft EIS/RMP and the preliminary Draft Eighteenmile EIS. If you have any questions concerning our review, please contact Brian Ross of our EIS and Energy Review Section at FTS 399-8516 or (206) 442-8516.

Sincerely,

Robert S. Burd
Director, Water Division

Enclosures

cc: BLM (State Director)
NMFS
USFWS
IDHW
IDFG

U.S. ENVIRONMENTAL PROTECTION AGENCY
REVIEW REPORT

LEMHI RESOURCE AREA DRAFT RMP AND ENVIRONMENTAL IMPACT STATEMENT AND THE EIGHTEENMILE WILDERNESS STUDY AREA EIS

Nesting EISs

Some confusion arose regarding the intended status of the "nested" Eighteenmile WSA environmental document. This confusion was attributable to lack of clear reference to this EIS in the Tables of Contents for the RMP/EIS (it appeared only in a table of contents for the appendices to the RMP/EIS), and the lack of explicit reference to two EISs in the Notice of Availability published in the Federal Register. Publishing such related EISs under one cover is a useful means of presenting all pertinent information so that agencies and the public may make a reasoned decision on the proposed actions, and your efforts to promote an early review of the wilderness management alternatives in this manner are commendable. Clearer reference that this has been done would be helpful for future BLM projects.

Existing Conditions

A thorough discussion of existing resource conditions is essential to the public's ability to determine whether the proposed planning direction can adequately protect those resources. For example, where riparian areas are already in unsatisfactory condition, riparian-related resources would not be protected by maintaining the historic level of impacts. Similarly, the adequacy of a trend toward improvement must be measured against the other resources being affected; anything short of the maximum potential rate of improvement regarding degraded chinook salmon habitat, for instance, would be extremely difficult to justify. 62-2

The EISs (both for the RMP and the Eighteenmile WSA) should present much more information regarding existing conditions. This is especially important for the following resources:

1. Water quality. The degree and areal extent of existing water quality problems should be discussed more thoroughly. Water quality problems related to existing minerals, timber harvesting, and grazing activities should be disclosed. Parameters of most interest include temperature, turbidity, dissolved oxygen, pH, and coliform bacteria. Comparison to State of Idaho Water Quality Standards should be made somewhere in the EIS. 62-3

2. Fish and Fish Habitat. The EISs should discuss where fish habitat exists in relation to other activities, and identify the species, or "species of special concern" (identified by the Idaho Department of Fish and Game) that exist in the area, as well as discuss their status and any trends with respect to population, sedimentation, and water quality as it affects fishery habitats. 62-4

-2-

3. "Critical" and "Crucial" habitats for fish, game and plants. These terms seem to be used rather loosely in the Draft RMP/EIS. If criteria for the identification of such habitats are indeed as given in the Glossary (page S-21 in the draft EIS for the RMP), it is important that the EIS consider the compatibility of planned activities in any of them in detail. We believe that such areas should have especially protective and specific standards associated with them. Critical and crucial habitats should be clearly identified wherever they occur. This apparently has been done only for deer and elk. 62-5

4. Soils. Specific areas having significant erosion or instability potential should be identified. This could most easily be done by summarizing such conditions in the descriptions in Appendix E. 62-6

Cumulative Effects

The Draft RMP/EIS discusses evaluating the environmental effects of planned activities on a case-by-case basis. Cumulative and combined effects of activities should be discussed as well. Ideally, the RMP/EIS itself would evaluate the potential cumulative and combined effects of the various management alternatives, at least generally. Short of this, the Final RMP should describe the process the BLM will use for evaluating such effects.

We have discussed the use of "area analyses" with the national forests adjacent to the BLM Lemhi Resource Area. Evaluations similar to the Forest Service's area analyses should be useful for the BLM, as well. Such an analyses would consider the effects of several similar activities, and a variety of different types of activities, over a fairly large area and period of time. 62-7

Whatever process the Final RMP and EIS discuss, the following points should be addressed. What would be the areal coverage of a single evaluation (e.g., 3rd order drainages)? What period of time between planned activities would be considered? How could planned or ongoing activities be modified if these evaluations predicted significant cumulative effects? We believe that these evaluations should receive public review as draft EAs or EISs. Activities under the Resource Monitoring and Evaluation Plan should be coordinated so that potential cumulative and combined effects can be detected.

Riparian Areas

The proposed RMP (page S4) states that "All BLM initiated or authorized programs and actions potentially affecting wetland-riparian areas will comply with the spirit and intent of Executive order 11990 (Wetlands)..." In terms of avoiding "long and short-term adverse impacts associated with the destruction, loss, or degradation of wetland-riparian areas."

We are pleased to see this direction explicitly stated. However, the proposed RMP does not appear to provide protection of riparian areas that is commensurate with these statements.

In particular, heavy use of riparian vegetation by livestock (7D to 9D percent) would continue. It is unclear whether, overall, the current downward trend would continue, as it would under Alternative A (Draft EIS, page 4-12), or show a slight improvement as stated for the BLM preferred Alternative F (Draft EIS, page 4-87). This confusion arises because it is stated (Draft EIS, page 2-1) that the proposed action regarding grazing is as described in Alternative A and not Alternative F. Does this refer only to stocking levels, or does it extend to all grazing-related effects as well?

62-8 Even Alternative C, emphasizing amenities, may not offer adequate protection to riparian areas. The Draft EIS (page 2-21) states that "livestock would be removed from pastures when SD percent utilization of the riparian forage was reached." This is the most stringent of all the alternatives presented. However, the SD percent utilization standard would not necessarily afford appropriate protection to water quality (from coliform bacteria, sediment, or temperature changes), streambank stability (from trampling), or important fish habitat (from gravel sedimentation and from water quality changes).

62-9 Therefore, although we support Alternative C over the other alternatives presented, the Final EIS should more fully evaluate the various environmental effects attendant with different stocking levels (as they affect riparian areas). In order to show whether even Alternative C is adequately protective of all the resources BLM must manage. Specific standards reflecting the outcome of this evaluation should then be presented, along with an outline for monitoring whether the standards are being met.

62-10 We believe that the "spirit and intent" of Executive Order 11990 would not be reflected in any alternative which allows continuing degradation of riparian areas, or which did no more than maintain unsatisfactory conditions. This is particularly true in western states (including Idaho) where grazing on public lands accounts for a very small percentage of national production, but where riparian areas are of great importance to remaining fish and wildlife populations.

Resource Monitoring and Evaluation Plan

62-11 The categories presented are appropriate. Some of them should be expanded, however, to better reflect the importance of particular resources and the variety of planned activities that can affect them. In particular, riparian areas should be comprehensively treated as a separate element. Also, would this plan, outlined in Appendix I, change if the preferred alternative were changed? If so, how?

62-12 Under Vegetation, the criteria "warranting a decision change" is SD percent utilization on native range; riparian areas and meadows, etc., are listed as special cases where variation in allowable utilization level would be required. What variations would be considered, and where?

62-13 Greater emphasis should be placed on monitoring within the watershed and fisheries elements. Monitoring for water quality problems should occur in conjunction with any individual activities predicted to affect water quality (for example, timber harvest and road construction activities). The locations and frequency (every 2 years) proposed would be useful in monitoring trends, but would not provide timely information regarding the need to modify individual problem activities. For wetland/riparian areas and fishery habitat, streambank instability and heavy utilization would be monitored. How much instability would warrant modification of activities? Ideally, a trend toward instability would be rectified before stability is completely lost. Also, for fisheries, monitoring of in gravel sedimentation should be included where spawning or rearing habitat exists. We would suggest a standard of no more than 20 percent fines by depth where habitat for anadromous fish or species of special concern occurs. Here again, a monitoring frequency of once in 2 years is only useful for following trends and should be increased for specific activities and in problem areas.

Standard Operating Procedures

62-14 This section of the proposed RMP (page 38-58) defines the manner in which most activities will be managed. Reference to a cumulative effects program should appear in this section. Several other comments and suggestions regarding this section are presented below, by program category.

Energy and Minerals:

62-15 The BLM 3809 regulations should be discussed here. In particular, processes available to BLM to protect resources from potential adverse effects of mineral exploration and development should be summarized. When must Plans of Operation be filed and what must they contain? Will these receive review by other agencies or the public? What requirements can BLM attach to right-of-way permits and Plans of Operation (including reclamation bonding)? The "standard stipulations" (page 45) for oil and gas leasing should be appended to the RMP. It is stated (page 43) that "During any given year, the authorized officer could waive the special restrictions if actual conditions did not warrant them." Would such a waiver be coordinated with the appropriate state agencies (e.g., Health and Welfare, Fish and Game)? With federal agencies and tribes? Wouldn't such be a significant modification to the approved RMP and require revision and public review of the environmental documentation.

62-16

Forest Management:

62-17 Is there any old growth in the Lemhi Resource Area? If so, how would it be managed? Why is further logging reasonable prior to elimination of the existing backlog of areas without adequate restocking? What will keep this backlog from growing?

62-16 We are pleased that allowable harvest methods (i.e., tractor skidding) are tied to slope and land type. Support for the adequacy of the particular slope criteria given (page 46) should be provided in the final documents.

62-19 In our view, the most appropriate management for riparian timber is its designation as unsuitable for harvest. To the extent that harvesting occurs in riparian areas, it should be done in such a way that impacts are minimized. Specific protective standards for such harvests should be presented in the final documentation. (Also see Wildlife and Fisheries Program, below.)

Range:

62-20 We assume that livestock use adjustments may include temporary suspensions and closure. In this context, "unsatisfactory resource conditions" should be added to the list necessitating temporary suspensions and closures (page 48). Also "Environmental protection considerations" should be added under Grazing Systems.

Wildlife and Fisheries Program:

62-21 What necessitates the development of habitat management plans or multiple resource management activity plans? We note the different alternatives would develop these plans differently. Do such plans receive public review? We believe they should, for example, as draft EAs.

62-22 Seasonal restrictions could be waived, as under Energy and Minerals, above. The same questions should be answered here as we posed for Energy and Minerals. Riparian habitat would appropriately appear under a separate heading. The list of techniques that "can" be used to lessen impacts (page 51) is helpful, but lacks meaning without standards defining which would be necessary under which circumstances. Monitoring (as a Standard Operating Procedure) should also receive emphasis in ensuring that

62-23 particular techniques are adequately lessening impacts. What constitutes "adequate moist sites" in terms of timber harvest? When would untreated buffer strips be included in timber sale stipulations? We believe that wetlands and riparian areas in general are important moist sites, and that timber harvesting should generally not occur in them.

Soil, Water and Air:

62-24 The soil loss value of 1.0 ton per acre per year given as "tolerable" (page 53) should be further discussed. It appears to refer to rangeland productivity; how are other resources (i.e., water quality and fish habitat) affected? How would erosion on timber lands and at mines be kept tolerable? Are there municipal watersheds in the Lemhi Resource Area? Specific management will be required to protect water quality in such cases; stipulations should be outlined in the RMP. Domestic water supply may require separate treatment (its own heading) in this section of the Final RMP.

Detailed Management Plans:

62-26 Fish habitat and water quality are not discussed under this heading. Considering the variety of activities capable of adversely affecting them, they should be included. Also, as discussed previously, cumulative effects need to be addressed; this appears to be an appropriate place to do so.

EPA Preferred Alternative

We support redesignation of Alternative C as preferred in the Final EIS, with its expansion into a management document in the Final RMP. We do not believe that the other alternatives presented would adequately protect water quality and associated beneficial uses (such as fish and domestic water supplies), or riparian areas and their related resources and values. Furthermore, as the Draft EIS points out, the overall economic effects to Lemhi County of allowing fewer AUMs of livestock grazing then currently exist would be insignificant (a loss of one half of one percent of current permittees' personal income, and receipts to state and local governments one percent greater than FY84).

62-26 Our support for Alternative C is qualified, however, in that analyses were not presented in the draft documents which showed that even this alternative can adequately protect water quality and riparian values. If such analyses conducted for the final documents show a need for still greater protection, new alternatives would need to be analyzed in those documents in order to assure that water quality and riparian values are adequately protected. The critical factor is that the alternative selected for implementation in the Final EIS and the following Record of Decision must be one which can comply with the applicable water quality standards as demonstrated in the Final EIS.

Included with our support for Alternative C is support for the "All Wilderness" alternative in the Eighteenmile WSA EIS (Appendix G). Only this alternative would adequately protect water quality in the WSA; as is summarized in Table G-1, all other alternatives would allow activities which would produce unacceptable sediment loads. As noted in the transmittal letter, this appears to be the only alternative capable of complying with the Clean Water Act.

62-27 Mining would be generally excluded in the WSA under this "All Wilderness" alternative, but livestock use would continue. This EIS states (page G-19) that "Adverse impacts on water quality at present are said to be "at acceptable levels" no definition is given for this level, however. Also, no mention of trends is made. We are therefore able to give only qualified support even to the "All Wilderness" alternative at this time. The Final EIS for the WSA should evaluate in detail whether the livestock usage proposed is appropriate. (For example, what is the condition of riparian areas in the WSA presently? Are there water quality problems from coliform bacteria now? What is the condition of fish habitat in the WSA?)

Other Specific Comments

The following comments are provided primarily to aid in continued editing and refinement of the draft documents. They should not be considered to carry the same weight, in terms of EPA's concerns, as the preceding comments.

62-28 Draft EIS, pages 4-100 through 4-105. Short-term use versus long-term productivity should be evaluated for all the alternatives, not just the BLM preferred alternative. This applies to the Irreversible or Irretrievable Commitment of Resources" analysis, as well.

62-29 Appendix O. A similar analysis should be provided for the other alternatives. This would help address the uncertainties expressed earlier for the "bottom line" acceptability of each of them. We disagree with the statement on page O-3 that the preferred alternative is the "most reasonable approach to watershed improvement that can be expected" within the 20 year planning period. Alternative C would allow improvement on five to ten times more acres, while making only very minor overall economic change. Similarly, the last sentence of page O-5 implies that only 275 acres of riparian area improvement is "realistic." Since all the alternatives presented have been defined as reasonable (i.e., capable of being implemented), we suggest such statements be deleted in the final documents. Finally, it would be useful if acreages were included under each category in Table O-2.

62-30 ORMP, page 19. Given the definition of critical habitats in the Glossary, why are there no ACEC's in the Lemhi Resource Area? What is the difference between these designations?

62-31 ORMP, page 53. The basis for the criteria for sagebrush canopy cover should be given in the final documents.

62-32 ORMP, page 58. Does the BLM periodically produce summaries of upcoming EAs and EISs? If so, we would appreciate receiving them so that we may better identify projects where EPA involvement would be most appropriate.

62-33 DEIS, Table S-1. As is summarized here, the allowable cut of 1.07 million board feet per year is consistent among all the alternatives. How is this reconciled with the discussion in Chapter 4 of different losses in harvestable yield (e.g., 238 thousand board feet per year in Alternative C due to set-asides and closures?)

62-34 DEIS, page 2-3. Please explain the statement, "as defined by BLM policy, Alternative A is the proposed action for livestock grazing" (emphasis added).

62-35 DEIS, page 2-3. The statement that "The timber industry in Lemhi County is already depressed because of a shortage of timber" is at odds with statements made in the DEIS and proposed Forest Plan for the adjacent Salmon National Forest. There, less than half of the offered timber is expected to sell. The timber industry is seriously affected by a variety of circumstances. Reducing these causes to a single broad statement serves no useful purpose.

62-36 DEIS, page 2-41. Conflicts between livestock grazing and riparian related resources would continue under Alternative F. The statement that "No conflicts with other resources were identified at the proposed stocking level" should be rephrased or better documented in the final documents.

62-37 DEIS, page 2-44. The addition of the qualifying phase, "if practical" to the second full paragraph on this page conflicts with the statement on page 25 of the ORMP that surface disturbing activities affecting fisheries habitat will not be allowed. Which is correct? Also, Class III streams are specified on page 2-44, this is contrary to page 25 of the ORMP, as well. We support the statement in the ORMP.

62-38 DEIS, page 3-16 and 3-17. This fish habitat discussion reflects only the economic value of fishing on BLM land. For both resident and anadromous fish, this could greatly underestimate the overall value of these fish even in terms of only this one human use (i.e., fishing in other areas should be considered as well; for anadromous fish, this would extend to the ocean fisheries). This analysis completely ignores the importance of fish for other purposes; it also ignores the status of the fish populations themselves (for example, the precarious status of chinook salmon in the Salmon River Basin renders each remaining fish and all potential habitat extremely valuable to the continued existence of those populations. Fish and fish habitat deserve much more comprehensive treatment in the Final EIS.

District Manager

Bureau of Land Management

P. O. Box 430

Salmon, ID 83467

Geotlemeo:

63-1 We support Alternative A with two amendments: (1) Active preference contioue to be the stocking level; (2) AMPs be developed with necessary improvements to

63-2 operate under the principles of MULTIPLE USE and SUSTAINED YIELD.

We cannot support the (Preferred Alternative) for the following reaaona:

63-3 1. We simply caonot afford it. It costs in excess of one thousand (1,000%) of the existing Alternative A.

2. We are against any further wilderness.

63-4 3. We feel it is economically unsound and unfair to expect ranchers to pay for the costs of improving wildlife and recreation.

63-5 4. It unjustifiably attempts to cut livestock grazing for the benefit of wildlife and recreatioo.

63-6 5. Our present game popultion is more than we have winter feed for.

63-7 6. Forage allocatioo for wildlife is oot quantifiable with any degree of accuracy at this time.

63-8 7. Fence staodards need modified to meet each aituatioo.

63-9 8. Most of the problems caused by early spriog grazing could be handled with ao sllotment managemeot plao where the units could be rotated or, in some ioataoces, reseeded.

63-10 9. Iostream flow on Big Timber Creek should oot be s BLM consideration.

63-11 10. Alternative A takes laod out of governmeot ownership without adding aoy more. The Preferred Alternative is merely going to exchange laods. We think governmeot ahould stop acquiring land, with few exceptions.

63-12 11. The Preferred Alternative F emphasizea recreatioo aod aesthetic values too much over commodity production oo public laods.

63-13 12. Feocing to prevent livestock grazing is oot the aoswer to deteriorating riparian habitats.

Yours for better public lands,

Name and Address

Name and address

Name and address

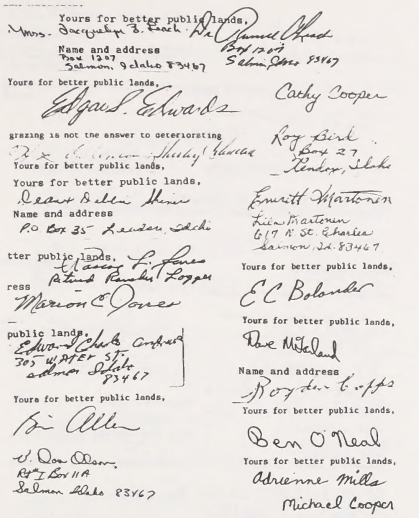
Name and address

Thank you.

Mark and Melissa McKinney
Box 17
Lemhi, Idaho 83465

Name and address

Name and address



Yours for better public lands,
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Yours for better public lands,
Edgar L. Edwards

grazing is not the answer to deteriorating

Yours for better public lands,
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Marion C. Jones

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E C Bolander

Yours for better public lands,
Dave McFarland

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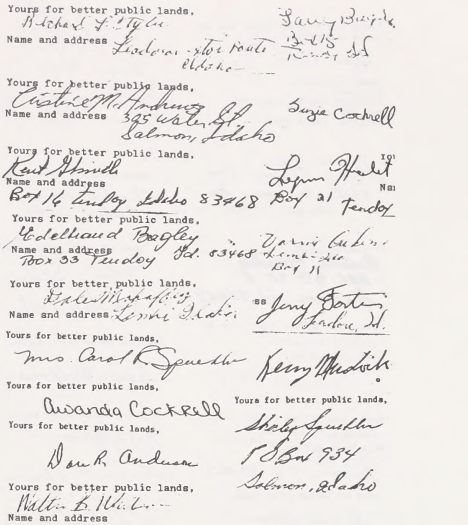
Yours for better public lands,
Adrienne Mills
Michael Cooper



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Yours for better public lands,
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Yours for better public lands,
Name and address

Yours for better public lands,
Name and address

Yours for better public lands,
Mrs. Carol K. Spaulding

Yours for better public lands,
Amanda Cockrell

Yours for better public lands,
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Kerry Shubert

Yours for better public lands,
Shelby Spaulding
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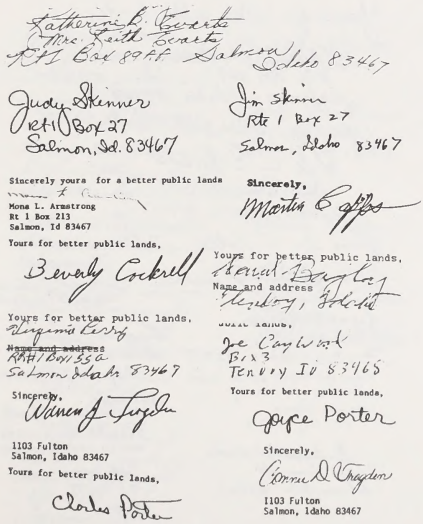

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Judy Skinner
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Jim Skinner
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Sincerely yours for a better public lands

Mona L. Armstrong
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Salmon, Id 83467

Sincerely,
Marion C. Jones

Yours for better public lands,
Beverly Cockrell

Yours for better public lands,
Name and address
Tendoy, Idaho

Yours for better public lands,
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Joe Caywood
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Yours for better public lands,
Joyce Porter

Sincerely,
Wanda J. Hughes

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Yours for better public lands,
Charles Porter

Sincerely,
Connie D. Hughes

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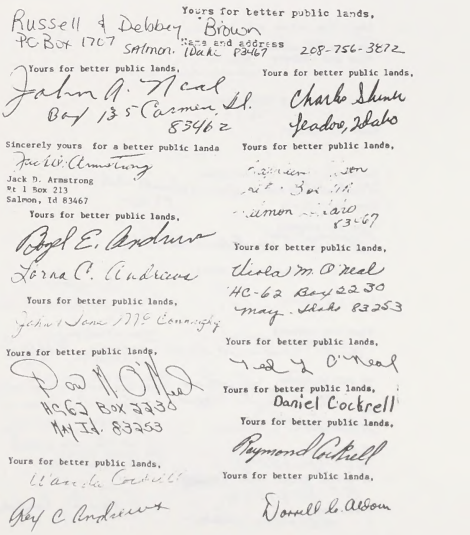

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Box 135 Carmen Id.
83462

Yours for better public lands,
Charles Skinner
Leadore, Idaho

Sincerely yours for a better public lands
Jack D. Armstrong
Rt 1 Box 213
Salmon, Id 83467

Yours for better public lands,
Boyd E. Anderson
Lorna C. Andrews

Yours for better public lands,
John & Jane Mc Geraghty

Yours for better public lands,
Don O'Neal
HC-62 Box 2230
May, Id. 83253

Yours for better public lands,
Name and address
HC-62 Box 2230
May, Id. 83253

Yours for better public lands,
Wanda Cockrell

Yours for better public lands,
Daniel Cockrell

Yours for better public lands,
Raymond Cockrell

Yours for better public lands,
Donnell L. Olson

Roy C. Andrews

Yours for true Multiple Use and sustained yield,

James Whittaker
Chairman
Citizens for Multiple Use
Box 240
Leadore, Idaho 83464

Yours truly,
Lex J. Kauer Pres.
Melva M. Kauer Sec.
McFarland Livestock Co. Inc

...er public lands,
Rosalie Hawley
...ss 506 9th ST.
Salmon, Id. 83467

Yours for better public lands,
Name and address

Yours for better public lands,
Louise M. Stahl
Name and address
1707 Main
SALMON, ID 83467

Yours for better public lands,
Delos Olson

Salmon Idaho 83467

Yours for better public lands,

Yours for better public lands,
Charles Leon
Leadore, Idaho

Yours for better public lands,
Frank E. Kohl

Yours for better public lands,
Ileta Hoffman

Yours for better public lands,
Roy Hoffman
Sharon Hoffman
Box 164
Leadore Ida 83464

Yours for better public lands,
Name and address
Marjorie Schaller
313 Augusta Ave
Salmon, Id 83467

Yours for better public lands,
Name and address
Leadore, Idaho 83464

Yours for better public lands,
Name and address
Minnie Clark Rt. 1 Box 94 Salmon, Ida 83467

Yours for better public lands,
Name and address
Bill Clark
Rt. Box 94 Salmon, Idaho 83467

Name and address

Yours for better public lands,
RT 1 BOX 69
Salmon, Ida. 83467

Yours
Name
Box 35
Idaho

Yours for better public lands,
Kathryn Bird
Name and address
4941 Whitaker
Chubbuck, Idaho 83202

Yours for better public lands,
Name and address

Yours for better public lands,
Name and address

Yours for better lands,
Lucinda P. Walker

Yours for better public lands,
Audrey M. Smith
Name and address Box 16
Lemhi, Idaho 83468

Yours for better public lands,
Name and address

Yours for better public lands,
Marlene Tobias, Box 13 Lemhi Ida
Name and address 83465

Name and address
Maxine Sager
Rt 1 Box 69 Salmon Id 83467

Yours for better public lands,
Name and address

Name and address
Box 35 ... Id. 83468

Name and address
Leadore, ID

...er public lands,
Retired Rancher Logger
...ss
Marion E. Jones

...ck grazing is ...
Jerry A. Peery
...er better public lands,
Rt 1 Box 155A
...d address
Salmon Idaho

Thank you for your time,
Yours for better public lands,
John Cranney
Cathy Cranney
Mr. and Mrs. John Cranney
204 Larson Street
Salmon, Idaho 83467

Randy Capps

Yours for better public lands,
Laura Edwards
P.O. Box 299
Salmon, Idaho 83467

Yours for better public lands
Dale C Edwards
P.O. Box 299
Salmon, Idaho 83467

Yours for a better world

Thank You
Lemhi Id 83465

June S. Playfair
Box 38
Lemhi, Idaho 83465

Everett Lish
Box 202
Salmon Ida 83467

Yours for better public lands,
Grace ...
Name and address
...

Sincerely
Mike & Donna Kossler
Star Route Box 3
LEADORE, Idaho 83464

...ss Gertrude W. Hatch
201 Lena St.
Salmon, Ida. 83467

Yours for better public lands,
Rt. 1 Box 88
Salmon

Bureau of Land Management
Salmon District
P. O. Box 430
Salmon, ID 83467

Gentlemen:

We support the existing situation or Alternative A in the Lemhi Resource Management Plan.

64-1 We do not want and cannot afford any more lands tied up in wilderness in Lemhi County.

Sincerely,

Reed L. Butikofer
Brett R. Butikofer
Helen Butikofer
Suzanne Butikofer

Box 28
Lemhi, Idaho 83465
Sincerely
Helen J. Kessler
Thomas J. Kessler

Box 983
Salmon, Idaho 83467
1119 Hwy. 93 N.
Salmon, Id.

Mr
Box 139 C
Salmon Idaho 83467
Box 744
Salmon ID. 83467

Box 28A
Salmon, Idaho. 83467
Sincerely
Helen Ellefsen
Star Route
Leadore, Id. 83464

1808 Main
Salmon Id. 83467

Jerry Hitesman
PO 10 Main Street
Salmon, Id
63467
JERRY HITESMAN

Melody Kaner
Lemhi, Idaho

Nancy Rector
POB 744
Salmon, ID 83467

Vicky Smith
Rt 1 Box 139C
Salmon, Id. 83467

Sincerely,
Marlene Waters

STAR HITESMAN
1510 MAIN STREET
SALMON, Id
83467

Mike Crowley
Box 1516
Salmon

Harold T. Waters
Box 6
Leadore Idaho
83464

Box 1516
Carmen Idaho

LETTER RESPONSES

All letters received are listed in the following table. Of the 64 letters received, 42 letters contained substantive comments requiring a response. They are noted below.

LETTER #	FROM	SUBSTANTIVE COMMENTS RESPONSE PREPARED
1.	Jim Kluesner	X
2.	Pacific Northwest Region, Bureau of Reclamation	
3.	State of Idaho, Transportation Department	X
4.	Idaho State Historical Society	
5.	Idaho Department of Fish and Game	X
6.	Targhee National Forest	X
7.	State of Idaho, Department of Health & Welfare	X
8.	Lemhi County Agent	X
9.	Idaho Air National Guard	X
10.	Heather Thomas	X
11.	Soil Conservation Service	X
12.	Rocky Mountain Oil and Gas Association, Inc.	X
13.	Continental Divide Trail Society	X
14.	U.S. Department of the Interior, Bureau of Mines	X
15.	Salmon Schools	
16.	Hadley Roberts	X
17.	Bob Charles	X
18.	Texaco	X
19.	Travis Whitaker	X
20.	Carrol and Pete Wells	
21.	Wilfred L. Keele	
22.	U.S. Department of the Interior, Fish & Wildlife Service	X
23.	Kenneth Hyde	X
24.	C. L. Gilpin	X
25.	LaMar Cockrell	
26.	Quinton Snook	
27.	Vearl C. Crystal	X
28.	Sam McKinney	X
29.	Ray Infanger	X
30.	Lemhi Livestock and Wool Marketing Ass'n., Inc.	X
31.	Mike Monroe	
32.	Walter McConnaghy	
33.	Peggy McConnaghy	
34.	J. Allen Jensen	
35.	Willard Moulton	
36.	James Whittaker	X
37.	Paula J. Whittaker	
38.	Eugene Edwards	
39.	Citizens of Bonneville and Jefferson Counties	
40.	The Nature Conservancy	X
41.	Idaho Department of Fish and Game	X
42.	Gorden Kirschenmann	X

43.	Matt Yakovac	
44.	Pat McConnaghy	
45.	Lance McCold	X
46.	Jeff Denton	X
47.	Lemhi Soil and Water Conservation District	X
48.	Zane Abbott	
49.	Dan French	X
50.	Joe Tonsmeire	
51.	Fran Tonsmeire	
52.	Bruce Mulkey	X
53.	John Amonson, Jr.	X
54.	Committee for Idaho's High Desert	X
55.	JoAnn Wood	X
56.	Dane Watkins	X
57.	Salmon National Forest	X
58.	Winfield Turner	
59.	Charles Wellner	
60.	Rodger Swanson	X
61.	The Wilderness Society	X
62.	U.S. Environmental Protection Agency	X
63.	Letter 63 from 110 individuals	X
64.	Letter 64 from 20 individuals	X

1-1 All public land considered for disposal, whether by sale, exchange, or Desert Land Entry, will be reviewed to see if it meets the criteria for disposal. Site specific decisions will be made regarding the disposal or retention of each parcel. If the lands are found to have public resource values, as listed in Standard Operating Procedures (Pages 39-41 Draft RMP/EIS), the lands will be retained in public ownership.

The Big Springs area that you wrote about will also be reviewed individually to see if it meets the disposal criteria. Based on the information you submitted, it appears that the parcels in this area may not be suitable for disposal. The parcels will be reviewed, through the environmental analysis process, prior to a final decision.

3-1 The Transportation Department's statement about preferring haul distances of 12 miles or less is demonstrated by the location of material sites throughout the resource area with the exception of those portions of Highway 93 within the Salmon River Corridor. Within this area, there are only 6 miles of highway adjacent to BLM administered lands. During resurfacing of the highway from Salmon to Ellis, material was crushed at Elevenmile Creek and hauled in excess of 25 miles southward. Because of the preceeding, the RMP will be changed by adding: "within the Salmon River Corridor" immediately after "25 miles" on Page 4-79 of the Draft RMP/EIS.

3-2 The Transportation Department feels that there are areas within the river corridor where vegetative or topographic screening would allow for the establishment of material sites while preserving the visual quality of the area. Bureau of Land Management field examination reveals that areas where this could be properly accomplished are presently in private ownership.

3-3 Existing material sites will not be affected by the RMP and would be allowed to expand to their authorized limits under all of the proposed alternatives. We would also allow the location of new sources of mineral materials on tributary drainages.

3-4 A complete archaeological inventory of BLM administered lands within the river corridor cannot be done by the BLM with present budgetary constraints. Site specific cultural resource inventories will be completed on any proposed expansion of existing material sites under all alternatives in the RMP.

3-5 Most portions of the highway right-of-way within the river corridor presently measure 100 or 200 feet each side of the centerline and allow ample latitude for realignment of the highway without further application.

5-1 The proposed management prescriptions for improving riparian habitat are summarized on page 24 of the Draft RMP/EIS. As a general rule improvement in riparian condition and reducing sedimentation will occur simultaneously.

Identification of (bank) stabilization projects will be done during the watershed activity planning phase where management options are evaluated in more detail.

5-2 Riparian areas will play a key role in the development of all AMPs and will be managed to insure their improvement. Guidelines for consideration are shown on page 51 of the Draft RMP/EIS. Timetables will be developed during the activity (AMP, watershed, wildlife) planning process.

5-3 Standard Operating Procedures (SOP) for the fisheries habitat program are listed on page 49 of the Draft RMP/EIS. There are SOPs that affect fisheries habitat management in virtually all resources mentioned in the SOP section.

5-4 Sediment yield models that predict sediment yields with any degree of reliability are nonexistent for our area. Confidence intervals of $\pm 100\%$ are considered good. Recommendations for sediment yields of 20-25%, although scientifically sound, have little meaning if the values cannot be substantiated with conclusive data.

The watershed that significantly impacts anadromous fisheries within the RMP area that we manage is Sevenmile Creek. Management changes in this watershed that will reduce sedimentation into the main Salmon River have been identified in all alternatives of the document.

5-5 The studies we are referring to here are not research studies, but utilization studies, monitoring studies, and Allotment Management Plans, Watershed Activity Plans, and Habitat Management Plans. Funding and manpower dictate how many and how fast these studies and plans will be done.

Many riparian areas can show a substantial improvement in a relatively short period of time (2-5 years) with exclusion of grazing. Improvements with grazing, although attainable, are much slower. Considering our obligations to write these plans, conduct the required studies, constraints with respect to manpower and funding, and lag time before improvement is realized, the 275 acre figure is a very realistic one. See Analysis of Proposed Riparian Management Appendix, page A-8.

5-6 As you suggest the differences between Alternative C and Alternative F are not great. This is because most fisheries habitat is in fair to good condition. Our main objective is to maintain or slightly improve existing conditions. This will not be as easy as it sounds. Deteriorating riparian habitat is a precursor of

degraded fisheries habitat. This situation exists on many of the perennial streams in the RMP area. Mature and overmature willows still provide shade, cover, and cool water temperatures along most streams, raising fisheries habitat condition classes up to fair to good. Regeneration of riparian shrubby vegetation is virtually nonexistent. This is one of the characteristics of unsatisfactory riparian condition and also indicates that if management changes are not made soon, fisheries habitat condition will also decline. The result is unsatisfactory condition riparian areas, but fisheries habitat that is still in fair to good condition. A concerted effort to reverse this trend is called for in the Proposed Plan.

5-7 The economic analysis of alternatives (Draft RMP/EIS, Pages 4-15 to 4-18, 4-31 to 4-34, 4-46 to 4-50, 4-62 to 4-65, 4-74 to 4-77, 4-90 to 4-93, and 4-99) showed that the changes resulting from the alternatives would have little impact on the local economy (less than 1 percent of local income and employment in any alternative). Expenditures for plan implementation have limited local impacts. Also, changes in permit value do not have a direct effect on local economies.

5-8 Good point. The text should read: "All perennial streams not included in these four categories are considered "unclassified" and will be evaluated prior to the implementation of management activities".

5-9 This was a document printing error on our part (see Page 4-50 of the Draft RMP/EIS).

5-10 Thank you for noting the error. The correct figure is 1391 AUMs.

6-1 The BLM is currently administering some allotments for the Forest Service and the Forest Service is administering some allotments for the BLM. For example, in the Dubois Ranger District, the BLM is licensing five allotments for the Forest Service and the Leadore Ranger District is managing one BLM allotment as part of an overall grazing system.

7-1 This has been incorporated into the Standard Operating Procedures (SOP). The Bureau of Land Management will coordinate with the Air Quality Bureau on the development of a Smoke Management Program for Prescribed Burning in Idaho and will abide by the plan when it is implemented.

7-2 There are no Class I areas in proximity to the RMP area and since prescribed burning is done during periods of instability when there is normally a lot of mixing, the probability of any impacts on Class I areas are negligible. Impacts of prescribed burning activities on air quality and on Class I areas would be specifically addressed in an Environmental Assessment.

7-3 Particulate emissions would not exceed National Ambient Air Quality Standards under any alternative. The attainment and maintenance of Federal and State ambient air quality standards is addressed in the Standard Operating Procedures for Air Quality of the Proposed RMP.

7-4 Impacts of prescribed burning activities on air quality will be analyzed on a case-by-case basis in separate Environmental Assessments for each prescribed fire.

8-1 Although livestock sales with Alternative F would initially decline by $193,976, this would translate into an earnings loss (based on the U.S. Forest Service IMPLAN Model) of only $5,412. Secondary impacts would increase this loss to $19,702. At the same time, benefits to the crop agriculture sector is estimated to increase direct income by $12,369 with the total benefit (including the secondary benefit) amounting to $25,805. The implementation cost of $1.7 million are one-time costs while the crop agriculture benefits are annual and the livestock losses are annual (until the benefits realized from the project developments increase available AUMs). By the end of 20 years, project developments are estimated to increase available AUMs such that the use level is slightly above current use.

8-2 See Response H1-2.

8-3 New Range Alternative: (a) Is the same as what is being proposed for I-category allotments. (b) Slightly higher variation on acre figures but what we said was 2,4-D was not considered due to high cost $17-20/acre and environmental constraints. (c) Slight variation on acre figure but, in general, what we proposed, however all seedings will be a mixture of grasses, forbs, and shrubs as appropriate (see Page B-6). (d) The same as what we proposed. (e) When evaluating each I-category allotment, we estimated the number of miles of fence and pipeline necessary to develop and implement each AMP. (f) Our estimate of cost is based on what it has cost in the past to complete a project, not just the material but also labor and equipment. ($500/ spring; $6000/mile fence; $15-20/ac, seed; $4500/mile pipe).

All fences would not be modified. It is estimated that approximately 41% (roughly 160 miles) of the approximately 360 miles of fence in the Lemhi Resource Area do not meet accepted standards for fences on big game ranges. It is doubtful each of the 160 miles will ultimately be modified. The figure of 160 miles has been displayed as more or less of a worst case situation. We are committed to altering as much of that mileage as adequate big game passage warrants.

The 3-wire fence noted as the "standard" for the Lemhi Resource Area does not necessarily preclude more substantial (and expensive) fences. It does mean, however, that there must be strong justification for constructing something other than the "standard".

Over 90 miles of 3-strand fence have been built in the Challis Resource Area since the late '70's. They have proven entirely adequate for containing livestock. We have seen no problems and none have been reported to us by the permittees involved, even though we have solicited comments to that effect from them.

9-1 While the need for Military Training Routes (MTRs) is recognized by the BLM, their existence is not in itself sufficient reason to eliminate lands from wilderness consideration. Low level military flights would influence the perceptions of solitude, as do commercial and private flights, although none of these uses have a direct impact on the physical environment.

One additional factor is that the Eighteenmile Wilderness Study Area is a small portion of a much larger roadless area, including lands in the Beaverhead and Targhee National Forests. The issue of MTR usage encompasses this whole complex of which the WSA is only one piece.

Since Congress, not the BLM, will make the wilderness decisions for this area, we feel that the conflict between MTRs and wilderness airspaces is a matter for their consideration.

The three Special Recreation Management Areas (SRMAs) are locations where specific recreational uses or values require attention by the BLM. None of the three can be moved and the two trails are already designated by Congress. Military overflights should have minimal, if any, impacts on the recreational qualities (i.e., historic location, crest of the continent, etc.) of the proposed SRMAs.

10-1 For most of the deer winter/spring range involved, improved ecological condition would indeed be better for deer. As noted elsewhere in the document, the fair ecological condition rating is a reflection of depleted grass and forb components and not because of too much brush (except for a few isolated exceptions). Increasing production of grass and forbs, while retaining existing browse stands, would add considerably to deer forage diversity and hence, to their nutritional well-being.

"Excellent" ecological condition does not "usually denote a dense stand of trees."

10-2 Same as Response H1-3.

10-3 For the ecological range sites in the Lemhi RMP area, the overall improvement from fair to good ecological condition will be beneficial to both wildlife and livestock. The overall objective, whether measured by ecological range condition or not, is to improve livestock forage and wildlife habitat rather than continue to maintain present unsatisfactory conditions.

10-4 Good point. It is difficult to make generalizations that apply to all situations within an area with the variety of land types as the Lemhi RMP area without exceptions. Some areas such as Withington Creek have riparian problems that are not associated with livestock use. Road layout and design, mining, and forestry practices have caused problems in localized areas. Within the RMP area, however, the majority of problems associated with riparian areas are livestock related. Soil instability and natural erosion are a problem, although livestock grazing on naturally erosive areas magnifies existing problems.

10-5 As you point out, riparian areas did evolve under a grazing influence. Historically, cyclic build-up and decline of wild herbivores resulted in variable use of riparian areas ranging from heavy use to none. Riparian areas are often quick to recover, as was probably the case during massive wildlife die-offs during severe winters. Present heavy livestock pressures at constant rates have resulted in deteriorating conditions with no opportunity for recovery.

10-6 The sales per AUM figure is based on ranch budgeting efforts done for other grazing EIS's in the area (Ellis-Pahsimeroi, Big Lost-Mackay, Big Desert) and represents total sales divided by total AUMs (from all sources). See Appendix H of the Draft RMP/EIS for a discussion of how this value was derived.

10-7 Forage, per se, was not measured. An ecological site inventory was conducted. See Appendix pages B-7 and B-8, Draft RMP/EIS. See also response 47-15.

10-8 There is no "professional" bias against livestock and a wish to maximize wildlife. Our concern is for the vegetative resource and the physiological requirements of the plants, which in most cases are not being met under the current grazing practices. The current grazing practices allow grazing to begin prior to range readiness. See response 46-53. Also see Implementation section of Lemhi Proposed RMP/Final EIS.

10-9 The initial stocking level of Alternative B is 61,910 (61,190 is an error). This figure is down from active preference because of the two allotments which are currently unallotted (Page 2-10, Draft RMP/EIS). Also 63,898 on page 4-22 should read 61,910.

10-10 You are correct, the management action summary for range and the environmental consequences summary for this alternative conflict heavily. That is why this alternative was not the preferred alternative. (Refer to Implementation section of Lemhi Proposed RMP/Final EIS.) Livestock adjustments can be either up or down depending on results of management and subsequent monitoring.

10-11 Although this generalization does not hold true for all allotments within the RMP area, it is a true statement for the RMP area in general. Specific riparian problems have been identified. Each allotment will be looked at individually when developing AMPs. Management actions designed to correct the problems will then be implemented.

"I" category allotments with serious riparian problems are identified in Appendix Table B-4 of the Draft Lemhi RMP. The allotments that have only minor riparian problems are those allotments which have little or no riparian areas or the BLM does not control or own those riparian areas within the allotment.

11-1 Location of fences will be looked at on a case-by-case basis when developing AMPs and Watershed Activity Plans. Improving riparian areas with livestock management and grazing will be used whenever possible. Only in those areas where the degradation is so severe or manipulation of livestock is unlikely to achieve riparian objectives will fencing to exclude livestock be done. Detailed decisions as to which riparian area will be improved by what types of management will be addressed when management plans are formulated.

11-2 We want fences to be visible, primarily to wildlife.

11-3 It is well established that sage grouse can be easily extirpated (eliminated) by improper vegetation manipulation. We felt it prudent to display up front some of the major considerations which will be made prior to manipulations in important sage grouse habitat. These will be further refined on a site-specific basis using criteria set forth in published habitat guidelines for sage grouse and by those conducting the site evaluation. Resource deterioration and economics will also be important considerations.

11-4 A mixture.

11-5 All new logging roads permanently closed to vehicular traffic will be water-barred to ensure proper drainage. Roads built on soils with high erosion potential will be evaluated for special erosion control measures, in which case seeding could be employed. The District Soil Scientist will identify such measures during the interdisciplinary review of timber sale plans for inclusion of erosion control stipulations in the timber sale contract.

11-6 See Response 11-1.

The exclusion of livestock from riparian areas is an insignificant amount compared to the total acreage within the resource area. Further, once the desired vegetative response is achieved, the area could be open for very controlled grazing use. There would be no permanent adjustment in grazing preference so there would be no irretrievable loss of income to the operator.

11-7 The Idaho Range Condition Worksheet was developed using parts of SCS' Range Condition Worksheet plus BLM's Watershed Inventory Sheet.

11-8 Yes. They were INTERA sites which means INTERAGENCY. These sites were developed by BLM with field examination by a SCS range conservationist and approval of the sites by the Idaho State Range Conservation for the SCS

11-9 Ecological condition is determined by comparing the present plant community with that of the potential natural community, as indicated in the range condition guide for a range site. Seedings, prescribed burns, and chaining are all considered under the general title of disturbed but the specific treatment would be indicated on the inventory maps upon completion of the project.

11-10 We did not intend any conflict in these two statements. We feel that in order to control the spread of noxious weeds the weeds themselves must be controlled.

12-1 While the increase in lands covered with the no-surface occupancy stipulation would be 244% under Alternative F (the 141% figure is in error and the final will show a 244% increase). This is approximately 77,369 acres which is an increase of 45,602 acres over the existing 31,767 acres presently covered with the no-surface occupancy restriction. Many of the tracts with this stipulation are small and the subsurface would be accessible for fluid mineral extraction on all but 12,720 acres.

Information available to the Bureau of Land Management indicates only that the Lemhi RMP area is "prospectively valuable" for oil and gas. Basically, this categorization is applied to nearly all unexplored areas and can be applied to most federal lands outside of producing areas and known geologic structures. There is little correlation between the terms "prospectively valuable" and "high potential". Most of the RMP area has been leased for oil and gas over the past ten years. A significant amount of seismic exploration took place in the late 1970's and early 1980's. Two wildcat wells have been drilled (one on state administered lands). Both wells were plugged and abandoned after termination of drilling before the target depths had been reached. While there is still very limited information about the actual potential for the discovery of major hydrocarbon resources within the RMP area, the past and present level of activity hardly suggests that the potential is "high".

12-2 Trade-offs were made during the development of the seven alternatives by the team of specialists preparing the RMP. There is no data to support the statement that "most of the no-surface-occupancy areas are located in areas considered valuable for oil and gas". Based on the information available to the specialists preparing the RMP, there would be no loss of revenue to state or local governments because of restrictions within the RMP.

12-3 Because there is no production within the RMP area, the increase in lands covered with a no-surface occupancy stipulation will have very little, if any, impact on the economics of either Lemhi County or the region. Lost or gained revenues from hydrocarbon production cannot be determined for each alternative because there is no production at present and the BLM does not anticipate any production within the period of the plan (20 years).

13-1 BLM agrees that more work is yet to be done before the final trail location is selected. However, we think that regardless of where a final trail route is located, there is a need to (and therefore we will) protect the environmental and aesthetic values of the entire crest of the Continental Divide. If the final trail route differs from the lands noted on the draft's maps (and we expect as you do that it will), then additions to the trail corridor will be considered. Because the formal designation process appears to be some years away from completion, the recommended uses and practices contained in the draft document are necessary to allow other uses to continue or occur in the interim and represent our attempt to anticipate future CDNST trail requirements while at the same time allowing continuing multiple use of adjacent lands.

13-2 The 1980 Management Option Plan (MOP) is still the guiding document for us in anticipating a future trail route. On Page 3-24 of the Draft RMP/EIS, a differentiation is made between the miles of Continental Divide in the resource area (29) and the miles of trail recommended in the MOP in the resource area (20). In view of the continued relevance of the MOP and its recommendations, we can only agree with all of your site specific comments. However, since we do not have the authority to select the final trail location, the RMP must remain general in nature and await future completion of a routing study and site specific RAMP. The site specific comments will be better addressed at this point in time.

14-1 Withdrawal areas <u>are</u> shown on the maps for each alternative. To superimpose mineral potential data on these maps would result in a significant loss of clarity on the maps.

14-2 Management restrictions are explained under the Standard Operating Procedures. Their effects are analyzed for each alternative under the Impact Analysis section.

16-1 A map of the locations of available commercial forest lands for the Proposed RMP and Final EIS (Map 5) has been added to the document. It has been included to provide the general location of the timber base, not for the analysis of site-specific impacts. Large-scale maps of the forest land classifications are available at the district office for more detailed review.

Specific timber harvest areas and logging road locations are determined at the timber sale planning stage, not the RMP level. This site-specific activity planning will be subject to interdisciplinary review through environmental analysis of individual proposed timber sales. For the sake of analysis of impacts, the Environmental Consequences section states that approximately 300 acres per year of available commercial forest land would be subject to harvest activity. Therefore, any acreage designated as available commercial forest land could conceivably be roaded and logged during the life of this plan.

16-2 In terms of protection of elk habitat, "restricted management" and "special management to protect elk winter range" are synonymous. See response to Idaho Fish and Game #41-5. The term "intensive management" is defined as "a high level of forest management intensity often characterized by silvicultural treatments (i.e., thinnings, planting of genetically-improved stock, control of competing vegetation, etc.) aimed at increasing the growth and yield of a regulated stand." The glossary will be amended with the addition of this term.

16-3 The Lemhi RMP allowable cut determination is governed by a completely separate process independent of, yet influenced by, the RMP process. The Salmon District's allowable cut is determined through inclusion with the Eastern Idaho Sustained Yield Unit (EISYU). As RMP documents are completed in the Burley, Idaho Falls, Shoshone, and Salmon Districts, a new commercial forest land base for the entire EISYU will be established. Any loss in timber yields resulting from set-asides or multiple use restrictions approved in these RMP documents will be entered into the cut computation, and only then can an accurate new allowable cut level be established.

The current allowable cut level is approved through FY 1988, at which time a new 10-year allowable cut level will be established. Since the proposed set-asides and multiple use restrictions in all alternatives are insignificant to the total land base and board foot production of the EISYU, we feel we can continue to support our allocated harvest level for the remaining two years of the allocation period.

The figures representing the loss of harvestable timber yield as a result of set-asides and multiple use restrictions cannot be expanded into an allowable cut reduction. These figures are merely estimates of production lost through specific set-asides and restrictions, and do not reflect the precise reduction in the sustained yield allowable harvest level.

16-4 Road management has not been ignored. Although no specific roads are mentioned, Item 2 under Motorized Vehicle Use on Page 54 of the Draft RMP/EIS allows for road closures regardless of season.

16-5 ORV closures (or limitations) are designated to solve site specific problems or avoid unnecessary environmental degradation. No site specific problems have been identified that would require ORV closures during summer months.

16-6 See Response 5-5.

16-7 This has been changed in the Proposed RMP to read: "The resolution of trespass will be considered a priority within the constraints of funding. An inventory will be done to determine areas being used in trespass. The cases will be reviewed to determine if the trespass should be authorized or terminated, based on the long-term planning for the area". Good point.

17-1 The actual use, as reported by the operator, for the years 1978 through 1982 were used to determine the economical and vegetative impact on the existing situation, Alternative A. These years grazing use determined the condition of the vegetation at the time of the inventory.

18-1 The comments made in the response to the Rocky Mountain Oil and Gas Association (12-1) also apply to the comments received from Texaco.

Alternative D was considered and analyzed within the EIS. This analyses indicated that if adopted, Alternative D would create unacceptable adverse impacts to other resource values for the benefit of mineral development. For this reason, Alternative D was not selected.

22-1 Section 7 consultation will be done where appropriate on specific projects.

23-1 See Responses 11-1.

24-1 We have found this to be a true statement from experiences involving the exclusion of livestock from riparian areas in other areas in the Salmon District. We are presently experimenting with the New Zealand type electric fences and have had moderately good success with this type of fence at a lower cost. When cattle are removed after the grazing season, the current in the wires can be shut off to facilitate wildlife movement.

27-1 See Response H1-5.

28-1 See Response 63-1 through 63-13.

29-1 See Response 63-1 through 63-13.

30-1 The Draft Lemhi RMP/EIS identified that 30% of the RMP area is in fair or poor ecological range condition, which led to the development of the Proposed Plan. Any adjustment in livestock use would follow the steps outlined in the Implementation Section of this document.

We tried to keep the number of alternatives down to a manageable level. There are an infinite number of combinations that could be used as alternatives. The impacts of wilderness, wildlife populations, and livestock use have been analyzed in the seven alternatives presented in this RMP.

30-2 Alternative A for wildlife fails to address the issues of how fisheries and wildlife habitat will be managed. Important habitat management plans would not be written and implemented to meet specific wildlife habitat needs. Also, Alternative A does not provide for meeting Idaho Fish and Game target wildlife numbers. Your proposed alternative does not address forestry, recreation, fisheries, watershed, wilderness, cultural, soils, water, air, and fire. (1) Through selective management, as explained on Page B-1 of the Draft RMP/EIS, not all allotments will require an AMP. (2) Initial stocking level at current use has been analyzed in the RMP. (3) 22,700 acres of brush control is part of the Preferred Alternative. (4) All seedings will be native desirable perennials. Crested wheatgrass will be planted on only the most unstable sites and then only as part of a mixture of desirable plants. (5) Spring developments have been identified and analyzed in the Preferred Alternative. (6) Pipeline construction and fence construction have been identified and analyzed in the Preferred Alternative and were the minimum to meet resource management objectives.

36-1 The 9 acre/AUM figure is used for analysis purposes only and stocking rates will only be set after monitoring studies are completed. There are 454,707 acres of public lands in the RMP area, on which we currently allow up to 63,898 AUMs. This translates to 7.1 acres per AUM. (Draft RMP/EIS Page 3-10) Also refer to Implementation Section of this document.

There are approximately 1,800,882 acres in the Salmon National Forest (SNF) on which they allow 54,100 AUMs. You are comparing stocking rates calculated by two different methods. The stocking rate on the SNF using BLM methods would be 33.29 ac/AUM.

36-2 Adjustment in wildlife numbers have been made in this document to agree with Idaho Fish and Game targets. No adjustment was made in domestic livestock AUMs because they were never tied to wildlife forage demand, but were based on the need to improve ecological range condition.

40-1 You are correct. Physaria didymocarpa var. lyrata is a candidate species. Our policy, however, is to treat candidate species as though they were listed. To our knowledge, Astragalus scaphoides

was not being considered for candidate status until after the writing of the draft RMP. The inadequacies you have pointed out have resulted in changes and additions in the text of the Proposed RMP under the heading "Changes in the Proposed Plan", and Appendix I-1 of the Draft EIS, dealing with resource monitoring.

41-1 We fully intend to allocate sufficient forage to support the big game population goals agreed to with the Idaho Department of Fish and Game (see Draft RMP/EIS Page 50, Paragraph 1 under Terrestrial Wildlife Habitat, Page 2-42, Paragraph 1 under Wildlife and Table C-1, Alternative F). We are required to delay formal allocation until monitoring commitments are met.

41-2 Refer to Response 16-1.

41-3 Refer to response H1-1.

A meaningful timetable could only be provided given a knowledge of funding and manpower over the twenty-year life of the plan, as well as the ability to predict how various riparian areas will respond to different management prescriptions. Since this is not possible, we have refrained from including a timetable based solely on speculation.

41-4 The resource specialists could not identify changes in wildlife-based recreation as a result of any of the alternatives. As a result, no economic benefits or costs could be identified. The affected environment section (Pages 3-36 and 3-37 of the Draft EIS) shows that hunting and fishing provide a significant portion of the Lemhi County economy.

41-5 We deliberated over what and how to include special management restrictions on timber management for elk habitat protection/enhancement. There are a number of methods which could be used depending on the particular stand involved and how elk use the area. Short of including a shopping list of possible restrictions, we decided to include some general statements (see Draft RMP/EIS, Page 50, Paragraph 1 under Terrestrial Wildlife Habitat, Page 51 Forestry Activities, and Page 2-30, Paragraph 1 under Forest Management). We have identified 1,179 acres of uniquely sensitive timber stands and will work out the details of specific management practices at the activity planning level. We are still committed to wildlife accommodation on the remaining commercial timber acreage that will be handled through consultation with the Idaho Fish and Game and the EA process.

41-6 There are 1,064 acres of poor ecological range condition within the RMP area and we feel that 595 acres would be the minimum that would be improved.

41-7 Corrections have been made due to this comment.

41-8 See Response 16-4.

41-9 Sounds good.

We have initially identified 1,179 acres of commercial timber for special management with regard primarily to elk habitat. It is understood that acreage may be subject to change due to new of clarifying information.

41-10 The objective of the RMP is to have all livestock adjustments made within the 20 year life of the plan.

41-11 No. Seasonal restrictions can be applied under the regulations governing the exploration for leasable minerals. However, it would be difficult to apply seasonal restrictions if a discovery is made. Loss of wildlife habitat would have to be mitigated during the preparation of Environmental Assessments or Environmental Impact Statements. This statement will be deleted in the proposed RMP.

41-12 We agree that qualifiers may appear weakening or redundant, it normally being understood that some variation from an absolute is to be expected as a result of more detailed inventory and planning. Considering the varied background of people reading the RMP, we felt it necessary to use qualifying terms. For example, we have a few timber stands which, due to their location, snow depth, or having previously been logged, receive little or no use by elk. In such instances, the guidelines may not be particularly relevant. Also, brush control may be desirable when it is invading upland meadows.

41-13 See Response 41-12.

41-14 Yes.

41-15 Most of the improvement (albeit limited) would occur on non-forested habitat. This would mostly involve non-game species and forage for big game. Elk numbers would decline as a result of timber activities. Antelope would be reduced due to a migration route being sealed off. Refer to Pages 4-70 and 4-71, Draft RMP/EIS.

41-16 Refer to Response 16-3.

41-17 Good point. Draft RMP/EIS should be corrected on pages 2-20 and 2-42 under wildlife by indicating seven HMPs will be developed and by adding the following to the list of HMPs:

Antelope/Sage Grouse	Upper Lemhi Valley	39,000 acres

This additional HMP is also indicated in this document under the Proposed Management Prescription.

41-18 Correction made due to this comment.

41-19 The study to which you refer has not been finalized. The only final report available is on steelhead fishing. As these final reports become available, they will be used in future activity plans and environmental documents.

41-20 On Page 4-5 of the Draft RMP/EIS in the Impacts to Livestock Grazing section, it points out that there are AUMs available for activation which are being carried as voluntary non-use by the permittee. These non-use AUMs may, by request of the permittee, be activated at any time up to an area-wide total of 63,898 AUMs. However, the expected trend would indicate that only 2% above the 5-year average would be used.

While overgrazing is occurring on some allotments, other allotments are being under-utilized. Activation of underutilized allotments with reduction of overgrazing will result in net increase in domestic livestock AUMs available.

41-21 Under Riparian Habitat; this should read 225 acres (Page 4-101 of the Draft RMP/EIS).

41-22 We have not yet established a priority listing of I-category allotments for development of AMPs.

42-1 On those I-category allotments that have potential for deferred or rotation grazing, they will be deferred or rotated. However, there are many allotments that do not have these options and the physiological requirements of the plants can best be met by delayed grazing seasons.

42-2 See Response H1-2.

42-3 See Response H1-3.

42-4 See Response 36-1.

42-5 Calf weights are a very indirect method to determine range condition. There are many factors which influence this weight, starting with weight at birth and health of the cow, plus pounds of feed per day per cow prior to grazing the public land. The Bureau is not authorized to demand accurate calf weights, but is authorized and required to monitor the condition of the vegetative resource.

45-1 The rationale behind this analysis is found on page 1-5 of the Draft RMP/EIS. Also see Response 40-1.

45-2 Utility and right-of-way corridors have been considered in the RMP. However, we have avoided designating utility corridors for several reasons: the difficulty of designating corridors on a peacemeal basis, i.e., individual plans, where the pieces would eventually all tie together; lack of current information regarding utility company needs; difficulty in coordinating an effort

of this magnitude concurrent with developing individual plans; changing regional power demands; and lack of expertise within the BLM to conduct a corridor siting analysis without extensive coordination and consultation.

At this time, we are considering a statewide utility corridor plan. Amendments would be made to all the existing land use plans through one coordinated and comprehensive effort. Interagency coordination would be essential as well as coordination with utility companies, the public, the state, and other agencies such as Forest Service, that have land management responsibilities.

The various alternatives address the acres available for right-of-way development, as shown on Table S-1, Page xxii of the Draft RMP/EIS. The Preferred Alternative (F) includes 440,365 acres where right-of-way development could occur with no special restrictions. These areas will be considered on a case by case basis applying the criteria in the Standard Operating Procedures.

Restrictions would be imposed on right-of-way development on 4,405 acres that are included in the Salmon River Corridor. Rights-of-way within this area will be restricted to corridors established by existing utility lines.

The area proposed for wilderness designation, involving 14,796 acres, would be closed to all right-of-way development, whether or not the area is designated as wilderness.

45-3 Big game population goals were developed with the Idaho Department of Fish and Game. Big game forage demand was subsequently calculated against those goals. Although a cause-effect relationship may appear to exist between livestock and big game AUMs, at this stage there is none. This is best seen by comparing respective AUM demand figures of Alternative C with Alternative F for both big game and livestock.

45-4 See Analysis of Proposed Riparian Management Appendix, page A-8.

45-5 Based on the existing environment and environmental consequences, the partial wilderness alternative is a reasonable recommendation. The rationale listed on Page 37 of the draft plan are only a summary of the specifics in the EIS and Appendix G. While Alternative C does represent an all wilderness alternative, it was not selected. The BLM feels that sufficient rationale pertaining to past adjacent mineral activity, future mineral potential, the influence of adjacent nonwilderness Forest Service lands (all F.S. lands adjacent to the northern part of the WSA are recommended nonwilderness), and the shape and manageability of the area, has been given to support a partial wilderness recommendation.

46-1 Agriculture is the number three industry in terms of total earnings in Lemhi County behind Federal government and retail trade. Retail trade is not normally considered part of the economic base since it grows out of the need to serve primary industries (those that export and bring new money into the county). That part of retail trade earnings that result from recreation expenditures of non-residents (out of county) would be considered part of the economic base. So, although retail trade earnings are an important part of the local economy, the majority of it is not a part of the economic base.

46-2 The transfer of public land within floodplains, or those that contain wetlands or riparian habitat is being considered on parcels identified for exchange only (T-3). The maps, due to the small size and scale, do not show the exact location of the parcels. The parcels shown for disposal on Hayden Creek, Ferry Creek, and Walter Creek do not involve the creeks. The maps should show two parcels on Big Eightmile Creek that are for exchange only, instead of one parcel. The two parcels on Eighteenmile Creek are also for exchange only.

The exchange only parcels were identified due to their small size, location, private land uses, lack of access, and other factors that inhibit effective management. The objective of these exchanges is to acquire similar or higher resource values (wetlands, riparian, etc.) in a more critical or manageable location. As with other disposals involving wetlands, riparian habitat or floodplains, the patent would contain restrictions in the form of covenants, to protect these values and to preclude incompatible uses. If it is not possible to exchange these parcels and to meet the objective of the exchange, these parcels will be retained.

The statement concerning "sod busting" provisions in the new Farm Bill deals with government set-asides on 45,000 acres of highly erodible land. There are no lands in Lemhi County that apply to this.

46-3 The Executive Orders for management of floodplains and wetlands are mentioned in the Draft RMP/EIS on Page 51 of the Standard Operating Procedures. The planning criteria on Page 8 of the Draft RMP/EIS lists existing law, regulations, and BLM policy as they pertain to all public land management activities. Criteria for disposal of wetlands was not specifically addressed on Page 9 of the Draft RMP/EIS because wetlands are not entirely precluded from disposal. Page 9 lists the criteria used to preclude land from disposal.

46-4 The term "significant", as used in this context, refers to unique geologic resources that, because of their uniqueness, have value for scientific recreational or educational values. Examples would

be the discovery of a "petrified forest", unusual geologic formations, fossil beds, etc. Long-term and cumulative impacts to other resources can only be assessed when a specific conflict has been identified in relation to a particular discovery or project.

46-5 Using the most up-to-date figures found in the Preferred Alternative (#12) of the Salmon Forest Plan, the forest expects to sell approximately 10.6 MMBF of sawtimber per year. Timber sales on BLM available commercial forest lands within the RMP area are expected to supply 1.07 MMBF per year. Future timber harvests from other sources (i.e., State and private lands) in Lemhi County are expected to be insignificant. Therefore, the yearly contribution to the total timber harvest in Lemhi County from BLM lands in the RMP area is approximately 10 percent.

The economic analysis provided on Page 3-37 of the Draft RMP/EIS uses the latest economic data available at the time of this draft. The figures clearly show that in 1982, the average harvest of 1.07 MMBF from the RMP area would equal 7 percent of the total amount harvested in Lemhi County.

46-6 No, the issue is not turned around. Issue C will meet the physiological requirements of the vegetative resource.

(a) Past grazing practices of season long grazing starting on May 1 and running continually through September 30 or October 15. See Chapter 3, page 13 of the Draft RMP/EIS.

(b) The five year average use figures includes, if there are any, extensions which were allowed during the 1978-1982 grazing seasons. This data is the reported use of the operator after the grazing season.

46-7 Yes. These areas appear to have utilization levels higher than what will be allowed in Table I-1, Appendix I, page I-2, Draft RMP/EIS.

46-8 Refer to Response H1-2.

46-9 Correction made due to this comment.

46-10 Each parcel proposed for disposal will be evaluated in more detail during the environmental assessment phase for impacts to water quality, watershed stability, and wetlands. Decisions on disposing or retaining parcels will be made based on assessment findings.

46-11 See Response 46-10.

46-12 In this particular case, Agency, Pattee, and McDevitt Creek's special management emphasis has been given to big game/snowmobile conflict, and "may" is more correct than "will".

46-13 Seven existing leases will expire in 1987; two leases expire in 1991; and two leases expire in 1992. All existing leases in the Eighteenmile WSA have the "Wilderness Stipulation" which severely limits activity on the lease in accordance with the district-wide Oil and Gas Leasing EA and the Interim Management Regulations. While there is no statutory prohibition against leasing in a WSA, BLM policy at the present time is that new leases will not be issued. When applications are received, they will be held in suspense until the policy changes or Congress decides whether a particular WSA should be included as part of the wilderness system.

46-14 Timber hauling distance is only one of many variables in predicting the economic viability of logging in the Eighteenmile WSA. Regardless of hauling distance and any other logging costs, the 2,283 acres of suitable Commercial Forest Land (CFL) in that area has a relatively low significance to the total timber industry in Lemhi County (Table 4-10 of the Draft RMP/EIS). However, the timber resource is important to local ranchers in the Leadore area who have historically used the area for the harvest of fence posts and corral poles.

46-15 Most weed problems originated by human activities and are being perpetuated by surface disturbing activities and overgrazing. Control of noxious weeds in the recent past has been limited to biological control via thistle beetle. Detailed information on noxious weeds is available in "Northwest Area Noxious Weed Control Program EIS" and "Idaho Noxious Weed Control Environmental Assessment".

46-16 These areas are in the Idaho Falls District.

46-17 Twenty years is the life of the plan. See Implementation section of Proposed RMP. According to 43 CFR 4110.3-2(b) "...the difference between the authorized grazing use and the grazing preference shall be held in suspension".

46-18 Yes. They will also help maintain or prolong use of certain habitats and may, in a few cases, temper use of private land.

46-19 The 6,749 AUMs you refer to are those cattle equivalent AUMs that are required to support the target wildlife number set by the Idaho Fish and Game Department. The amount of competitive AUMs have not been determined at this time and should be part of the activity plans such as Habitat Management Plans and Allotment Management Plans. See also, Response 47-12.

46-20 There is not always a direct correlation between fishery streams in poor condition and riparian zones in unsatisfactory condition. Unsatisfactory condition riparian areas are usually a precursor of declining fisheries habitat. An example of this is Eighteenmile Creek. The fisheries inventory shows Eighteenmile Creek is

in excellent condition, yet riparian condition is unsatisfactory. Mature woody species such as willows still provide shade and channel stability, but woody species reestablishment is poor or nonexistent because of heavy livestock use in riparian areas. With no regeneration, as mature species die, the fisheries condition will decline as well because of reduced shading, channel instability, and increased sedimentation.

These types of problems will be addressed when developing AMPs for the areas. Monitoring methods will vary depending on objectives and will also be decided upon during activity planning. See Analysis of Proposed Riparian Management Appendix, page A-8.

46-21 Correction made due to this comment.

46-22 Refer to Implementation Section of this document.

46-23 Same as Response 46-6(b). Utilization will be one of the factors measured under range monitoring.

46-24 Refer to Implementation Section of this document.

46-25 It was mutually agreed with the Idaho Department of Fish and Game that 20-year goals would not be particularly meaningful and could be misleading. Mid-course corrections during the 20-year period to reflect changing priorities or goals of the Idaho Fish and Game will be made.

46-26 These details will be developed at the activity planning level. Forage utilization limits for livestock will undoubtedly require livestock removal from some crucial elk winter ranges.

46-27 See Response 5-6.

46-28 We are committed to providing wildlife forage and cover (see Page 50, Paragraph 1 under Terrestrial Wildlife Habitat in the Draft RMP/EIS).

46-29 Season of use extensions will be handled on a case-by-case basis and will be analyzed through the Environmental Assessment process. The Area Manager's decision will be based on sound range management. All actual use will be reported and certified by the permittee within 15 days of completion of the grazing use.

46-30 At this point, we do not know what areas the recently reintroduced bighorn sheep herd will select for lambing. Speculation could be made based on topographic features, but until lambing preferences are noted, we are in pretty much of a holding pattern. Once known, we will take what actions are required to help perpetuate that species. Comparatively little use of BLM administered land is made by mountain goats. What use is made does not occur in areas subject to appreciable impact by logging, and it is doubtful the Continental Divide Trail would have any notable influence on them.

46-31 See Response 46-26 above. Yes, all burns, etc., will be monitored for objective attainment and we will make management adjustments accordingly.

46-32 This will be corrected in the Proposed RMP.

46-33 A major portion of our monitoring program is going to be utilization transects. See Appendix I, Table I-1, page 2 of the Draft RMP/EIS.

46-34 You are correct. It is possible that as much as 40% or more of cattle-equivalent AUMs for elk are non-competitive. As we get into activity planning, we intend to nail down that relationship for both deer and elk.

46-35 Riparian key areas, utilization limits, and types of monitoring would be identified during activity planning.

46-36 Any additions to existing pipelines or new water will be installed only upon completion of an Environmental Assessment which will have input from the wildlife biologist.

46-37 See Prescribed Fire, Page B-5 of the Draft RMP/EIS. Monitoring will be used to determine the proper stocking levels.

46-38 Birch Creek is an important recreational fishery. The majority of Birch Creek is being intensively managed as such by the Idaho Falls District. A relatively small portion of Birch Creek is managed by the Salmon District. Although management of Birch Creek for improvement will be addressed during the implementation of AMPs, we felt we could obtain more riparian improvement for less money by concentrating on other areas.

46-39 See paragraph 2 on page 3-18 of Draft Lemhi RMP/EIS and response 61-3.

46-40 Trapping in this area is mostly recreational in nature; effort extended is very inconsistent between years and, though possibly financially important to a few individuals, it does not make a significant contribution to the local economy.

46-41 BLM provides a fairly small but highly significant amount of livestock forage due to when it is available. A great deal of the BLM grazing is for critical spring and fall grazing when cattle need to be moved off of private or Forest Service ranges. Other resources, such as wildlife, were not valued on a per AUM basis. Although economic impacts, especially those related to wildlife, are not confined by political subdivisions, it is felt that the vast majority occur in Lemhi County. Adding other counties into the economic region would not aid in the decision making process. Other types of recreation and non-consumptive wildlife uses are not discussed due to a lack of data on the extent or value of such uses.

46-42 It is anticipated that some reduction in use of private land by big game may occur as a result of the improved habitat conditions we hope to obtain. Observed behavioral patterns (elk, especially) indicate that use (some years substantial) will occur regardless of the quantity of alternative forage. It was not within the scope of this plan to specifically address mitigation of private land impacts.

46-43 There is a 40 acre minimum size for mapping size so that areas around water troughs would not be large enough to be delineated. The Order 3 soil survey did not delineate the riparian areas because of their size. We are aware that these areas have problems and are so noted in Appendix B-4 of the Draft RMP/EIS.

46-44 The stocking rates listed in Appendix B, Table B-4 of the Draft RMP/EIS are based on active preference.

46-45 The exact actions on every allotment will be determined when the AMP is developed.

46-46 Geertson Creek has a management alternative which reads: "Develop additional water sources; change salting program; require cattle movement after an acceptable level of utilization has been reached." It is also stated in Table I-1, Page 1 of the Draft RMP/EIS.

46-47 The activity planning phase will establish objectives and criteria that will be monitored to evaluate management strategies for riparian improvement.

46-48 All water developments will be installed after completion of an Environmental Analysis in which wildlife concerns will be addressed.

46-49 Range improvements will be implemented prior to livestock adjustments (see Implementation section of the Proposed RMP). The AMP and associated monitoring will take into account range improvements in order to avoid misinterpretation of data.

46-50 We do not have a list of species that will be used for reseeding. Crested wheat will be considered only after test seedings with other species have been tried. All seeding will have a mix of grass and forb species and, as appropriate, shrubs (see Plowing, Disking, and Seeding, Page B-6 of the Draft RMP/EIS).

46-51 Type of monitoring will be established on a case by case basis during the development of AMPs and watershed activity plans depending on management objectives.

46-52 An annual rest pasture is one of several viable options we will consider at the activity planning level.

46-53 As an example, Bluebunch wheatgrass is considered range ready at third leaf stage or approximately 8 inches in length. Holding utilization to 50% will provide for the physiological requirements of the plant.

46-54 Lower Reese Creek, (Allotment 6237), does not meet the criteria on Page B-1 of the Draft RMP/EIS, the first six questions to qualify as an Improve Category Allotment. Also, see Page B-2 of the Draft RMP/EIS.

46-55 The majority of the springs and seeps that are on the Smelter Gulch and Mammoth Sawmill Allotments are on private land. Management of these areas will be included in the Allotment Management Plan and the Habitat Management Plan.

46-56 Mima mounds are known to exist in these allotments. The vegetative manipulation you refer to will be considered when allotment management plans are developed for these allotments. As with all range improvements, it will be subjected to benefit cost analysis and mechanical treatments as a rule are extremely expensive which results in very low benefit cost ratios.

47-1 The BLM is required to do a wilderness study and make recommendations to Congress.

47-2 Congress has stated quite clearly that livestock grazing should continue in the same manner and degree as prior to designation.

47-3 The partial wilderness alternative recommends those lands with the highest potential for mineral resources in the WSA for non-wilderness uses.

47-4 The public land identified for agricultural development must meet the criteria on Page 41 of the Draft RMP/EIS (Agricultural Development-Standard Operating Procedures). If these criteria are met without conflicting with other resource uses and values (listed on Pages 9 and 39-40, items 1-9), the highest and best use of the land may be agriculture. These lands would then be available for disposal through the Desert Land Act. If these lands also meet the disposal criteria for sales or exchanges, these disposal methods could be used.

47-5 The criteria for land sales (Page 41 of the Draft RMP/EIS) must be met whether the lands are suitable or unsuitable for agriculture.

47-6 Identification of crucial wildlife habitats which enhance or allow the continued use of adjacent BLM administered land is standard planning procedure. Acquisition of those crucial habitats identified in the Lemhi RMP would be through some mutually agreeable exchange. In rare instances, such lands may be purchased but current budgets preclude that option.

47-7 See Implementation section of the Proposed Lemhi RMP.

47-8 This is our standard practice and is basically the objective of the Preferred Alternative.

47-9 Benefit cost analysis will be performed on all allotments and range improvements. Your range improvements are very similar to our Preferred Alternative. The proposed fences and pipelines are an estimate of what we expect to need in order to implement Allotment Management Plans on all I-category allotments.

47-10 See Response 11-1.

47-11 With 30% of the planning area in only fair or poor ecological condition and 57 allotments in the Improve Category, proper range management is not occurring. The proposed 18% reduction would seem to be more than justified.

47-12 The proposed increase of deer in the Preferred Alternative (F) has been lowered to about 1,950 animals at the request of the Idaho Department of Fish and Game. The corrected population projection for deer making substantial use of BLM administered land would be around 9,350. Population projections of 2,194 elk, 2,950 antelope, and 200 bighorn sheep, as shown in Alternative F, are not being changed.

47-13 See Response H1-3 and 8-3.

47-14 Riparian acreage was calculated by measuring the number of miles of perennial streams. We estimated that on the average a riparian area was 60 feet wide and there were three times as much riparian area in seeps, bogs, intermittent streams, springs, and meadows within a drainage as there were perennial streams. We felt the threefold figure was very conservative, but easily justifiable. The total acreage came to 6,637 acres.

We estimate our poor condition riparian areas at 1,500 pounds per acre. These riparian areas are utilized at an average of 80%. This amounts to 9,956 AUMs or 19% of the AUMs. Using these figures the 50% figure would be high. Using these same calculations, only 1.4% of the RMP area would be riparian areas. Since no allocations were made based on these figures, it is somewhat irrelevant. The main point being that the riparian areas are being utilized a disproportionate amount of time by livestock relative to their area.

47-15 Your example is excellent since it represents 251,000 acres or 55% of the planning area. However, your figures do not generally occur in the area. Most of the Wyoming big sagebrush-Bluebunch wheatgrass sites currently only produce 350 pounds; are in fair condition with less than 40% of the production being grass species. See also Page 3-10 through 3-13, Draft Lemhi RMP/EIS.

47-16 See Response 10-4.

47-17 The Federal government can acquire land if it is in the public's interest or is required for the improved management of Federal lands.

47-18 The 5600 acres of land would be acquired primarily through exchanges with private individuals and the State of Idaho. The 4495 acres of public land to be disposed of has already been specifically identified. It may be necessary to identify additional land for exchanges on a case by case basis. There may also be the opportunity to exchange less acres of public land for more acres of private land, depending on the appraised values. An example would be with an agricultural trespass on public land that may be appraised higher/ acre than the unimproved private land that we want to acquire (primarily crucial wildlife areas).

Land exchanges will be considered on a case by case basis and, as stated, must be in the public's interest. The government has the authority to acquire land and, there are many opportunities to help block both the public and private land in the Lemhi Resource Area. Many individuals have expressed an interest in land exchanges. Most of these would improve the individuals land uses (ranching and farming) by consolidating the private land, transferring agricultural trespass to the individual, resolving misplaced fencelines, and numerous other examples. The lands to be acquired would meet the needs of the general public by acquiring crucial wildlife habitat (help reduce depredation on private land), wildlife migration corridors, public rangeland, scenic and recreational areas, and other resources and areas that could be enjoyed by the public.

47-19 Brush control and seeded areas would be classified as seeded or disturbed and not good ecological condition; 22,471 acres improved to good condition means that it would improve naturally through good livestock management.

Based on consultation with livestock operators and the inventory information, potential areas of brush treatment and seeding were identified.

In order to improve 50,000 acres of fair and poor ecological condition range to good, an initial stocking level of 16 acres per AUM on Wyoming Big sage/bluebunch wheatgrass would be required

47-20 The only sheep operation in the allotments that may be directly impacted by reintroduction of Bighorn sheep requested a conversion from sheep to cattle on April 17, 1985. This is consistent with standard operating procedures.

47-21 The demand for livestock grazing during the 1978 and 1982 grazing season was 52,541 AUMs. By that standard, the RMP meets and exceeds the demand for grazing.

47-22 The Federal Land Policy and Management Act of 1976 requires the BLM to study all of its lands for wilderness suitability and to make recommendations to the Congress through the Secretary of the Interior and the President.

47-23 Approximately 37% of elk winter range is in fair ecological condition. As noted elsewhere in the document, this rating is a reflection of poor grass and forb production. It is estimated that this production is only about 42% of what it would be at good condition. Elk consume primarily grass and forbs. Review Pages 4-82 and 4-83 in the Draft RMP/EIS.

Prescribed burning cost per acre was estimated to be a minimum of $4.00 to $5.00.

Project costs would be covered through normal funding procedures and possibly contributed or range improvement funds.

47-24 The inference that poor and fair ecological condition is always good for deer is incorrect. Additional production of grass and forbs while retaining existing browse stands (i.e., good ecological condition) would be much more beneficial.

47-25 Increased grazing, when accompanied by range developments, would NOT change the existing trend. (Typographical error).

47-26 30% of the range is in fair and poor ecological condition and most of the fair condition range is on low elevation deer and elk wintering areas. The deer and elk winter range is also the spring turnout or first pasture and the physiological requirements of the preferred species for domestic livestock (grass) are not being met. See Page 3-11, Paragraph 8 of the Draft RMP/EIS.

47-27 See Implementation section of the Proposed RMP.

47-28 The criteria for agricultural land development (Page 41 of the Draft RMP/EIS) was set jointly by the Idaho BLM and the Idaho Department of Water Resources. This criteria is used throughout Idaho when considering the suitability of land for agricultural development under the Desert Land Act. The criteria was developed by analyzing the soil capability classifications, acreages, and economic viability of past desert land classifications. We cannot change this criteria unless the Idaho BLM and Idaho Department of Water Resources changes it for the State.

47-29 Operations and reclamation of mined lands are covered under the "Surface Management" regulations contained in 43 CFR 3809. These regulations govern the surface management of operations permitted under the "1872 Mining Law" and their inclusion in the RMP would be an unnecessary duplication of a large amount of material.

47-30 Soils-loss tolerance is the amount of soil that can be lost in tons per acre per year and still maintain a high level of productivity over a long period of time. Establishment of tolerances for specific soils and topography has been largely a matter of collective judgement. Both physical and economical factors are considered. For soils in the United States, the maximum soil-loss rates thus determined range from 1 to 5 tons per acre per year, depending on soil properties, soil depth, topography, and prior erosion. In areas where pollution by sediment is critical, tolerance may be established based on reducing sediment pollution rather than for maintaining soil productivity. Erosion from timber management operations and mining operations would meet Idaho water quality standards by stipulating mitigation necessary for achieving those standards. Also see Appendix D-3 in the Draft RMP/EIS.

47-31 Minimum streamflows do not preclude existing water rights. Our purpose for filing for a minimum streamflow on Big Timber Creek is to maintain the present situation, but prevent additional diversions in the future. This would preserve the valuable fishery upstream of those existing diversions.

49-1 See Response H1-5.

52-1 Riparian areas that are properly grazed or ungrazed and that are in good condition do not normally deteriorate during cloudbursts and high water. In many instances, these areas become more productive as sediment is trapped in the floodplain by the naturally abundant vegetation associated with riparian zones. You are seeing a symptom, not the cause.

The Federal government is under a multiple use mandate in the management of public lands. We feel this particular stretch of Big Timber Creek would best serve the needs of the majority of the public managed as fisheries habitat. Although we make the recommendation as such, the State Water Board will ultimately approve or disapprove the application for minimum instream flow. See Response 47-31.

54-1 It has come to our attention that there may be more riparian problems associated with Eighteenmile Creek than we originally thought. Riparian areas will be addressed when developing an Allotment Management Plan for the Chamberlain Creek Allotment. Objectives will include maintenance or improvement of high quality riparian areas in the allotment.

The high percentage of good or excellent condition range (82%) of the entire allotment does not justify a 50% reduction in grazing.

Appendix B-4 (Page 55 in the Draft RMP/EIS)...are not designed for recreation; they are to insure good livestock management. With 83% of the range within the WSA is in good or excellent ecological condition, a 50% reduction is not justified.

54-2 Biological controls will be used whenever possible before herbicides are used. See Standard Operating Procedures, Page 48, Paragraph 4.

54-3 The increase in elk populations predicted in Alternative C is due to livestock reductions, timber set-asides, and a combination of other resource restrictions in an alternative designed to increase wildlife and wilderness values. Thermal and security cover are very important elements in elk winter range habitats. We feel that an increase in restricted timber acreage alone, over and above that proposed in Alternative F, would not significantly increase elk populations. Timber types found within the proposed 4,300 acres of set-aside acreage in Alternative C include Douglas-fir, lodgepole pine, Engelmann spruce, and subalpine fir. Markets for timber from these stands exist in Lemhi County in the form of independent post and pole yards, local ranchers, small family-operated sawmills, and the Salmon Intermountain sawmill.

55-1 See Response 63-1 through 63-13.

56-1 See Response 63-1 through 63-13.

57-1 See Response H1-3.

60-1 See Response H1-4.

60-2 Big game population goals were developed with the Idaho Department of Fish and Game. Big game forage demand was subsequently calculated against those goals. Although a cause-effect relationship may appear to exist between livestock and big game AUMs, at this stage there is none. This is best seen by comparing respective AUM demand figures of Alternative C with Alternative F for both big game and livestock. See also response H1-4.

60-3 See Response H1-3.

60-4 We are not aware of any studies that show that livestock use at present utilization levels in the RMP area benefit riparian habitat. Virtually all studies have shown that, in fact, grazing at these levels result in degradation of the riparian areas.

61-1 See Response 45-5.

61-2 The subject area lies within an interstate interagency wolf coordination zone. Two state wildlife agencies, three national forests, and two BLM districts meet annually to discuss and coordinate activities within this zone which may influence wolves or wolf habitat. This group necessarily maintains close contact with the U.S. Fish and Wildlife Service through both formal and informal Section 7 consultation. Since big game species would form a major portion of the prey base for wolves in this area, the well-being of big game is essentially mandated by law, regardless of wilderness status. The only exception to the above

would be related to activities under the 1872 Mining Act (See Page G-26 of the Draft RMP/EIS). No bald eagles are associated with the Eighteenmile WSA.

61-3 Maintaining fisheries habitat on 94.7 miles will require a considerable improvement in riparian condition. Many streams still have mature woody species providing shade and channel stability, but because of poor regeneration of these species, potential for serious negative impacts to the fisheries habitat looms in the near future if management for riparian habitat is not initiated. We feel that the efforts prescribed by this plan for riparian habitat will accomplish the desired objective. Improving water quality on Sevenmile Creek will also improve water quality on the Salmon River downstream from Sevenmile Creek.

61-4 Mitigation of livestock impacts to reforestation is covered in the Forest Management Standard Operating Procedures on Page 46 of the Draft RMP/EIS. Paragraph #4 states that "all harvest units susceptible to livestock damage will be protected by grazing closures or fencing until such time as regeneration becomes stocked and established".

We feel that the plan adequately addresses the timber program in relationship to reforestation and watershed degradation. Although not specifically highlighted, several elements within the Draft RMP/EIS provide for mitigation of the impacts of timber harvest. Specific reference is given to the Forest Management Standard Operating Procedures (Page 45-46, Draft RMP/EIS). Relative to your concerns, note the addition of the following to the Forestry Standard Operating Procedures: "All forestry practices will meet or exceed those set forth under the Idaho Forest Practices Act, Title 38, Chapter 13, Idaho Code." These State rules and regulations establish mandatory forest practices for protection of watersheds from the impacts of timber harvest. Copies are available from the Idaho Department of Lands.

61-5 See Responses 61-3 and Analysis of Proposed Riparian Management Appendix, page A-8.

61-6 With 83% of range in the Wilderness Study Area in good or excellent ecological condition, a 50% reduction in grazing is unwarranted. See Response 54-1.

61-7 The comparison of the economic impacts of Alternative B, C, and F, as shown in Chapter 4, illustrate the differences between emphasizing livestock grazing, wildlife recreation, and the preferred alternative. Given the available data, no changes in wildlife-based recreation use were identified.

62-1 Water quality and beneficial uses are adequately protected under the preferred alternative. The BLM is required to comply with the Clean Water Act and these standards will be met, as so stated in the Standard Operating Procedures (see Draft RMP/EIS, Page

53). We also recognize the reality that under a worse case situation, water quality could be accidentally degraded. In the case of the Eighteenmile Wilderness Study Area DEIS, we recognized the same reality, but on Page G-23, it was incorrectly stated that "sediment levels would exceed standards set by EPA." This sentence will be changed to read could, not would. The impacts to water quality discussed in the Wilderness EIS were predicted on substantial mining activity taking place. No mining plans have been received by the BLM, but if one is received, it would be subject to the Environmental Assessment process and all activity would comply with all environmental regulations, including the Clean Water Act.

62-2 Although there is Chinook Salmon habitat within the RMP area, stream dewatering has eliminated any possibility of this habitat being occupied. Any stream improvement based solely on improving Chinook Salmon habitat would not be worthwhile unless a change in water conditions allowed for spawning of adult salmon, and rearing, and migration of juvenile salmonids.

62-3 We have recently began a monitoring program in key watersheds collecting baseline data. These monitoring studies were located in areas where timber sale activities were either planned or ongoing, where mining activity was prevalent or where livestock conflicts exist. The data collected included pH, Dissolved Oxygen, turbidity, streamflow, water temperature, and a phototransect. We will be incorporating collection of coliform bacteria into the monitoring parameters in the near future to ensure conformance with Idaho Primary Contact Recreational Water Quality Standards.

If monitoring indicates standards are not being met, changes in management to correct the problem will be initiated.

IDAHO PRIMARY CONTACT RECREATIONAL WATER QUALITY STANDARDS

Coliforms
A. 500/100 ml. at any time;
B. 200/100 ml. in more than 10% of total samples taken over a 30 day period;
C. A geometric mean of 50/100 ml. based on a minimum of 5 samples taken over a 30 day period.

Dissolved Oxygen
Cold Water Biota
A. Dissolved Oxygen concentration exceeding 6 mg/l at all times.

Hydrogen Ion Concentration (pH)
Cold Water Biota
A. Hydrogen Ion Concentration (pH) values within the range of 6.5 and 9.0.

Water Temperature

Cold Water Biota

A. Water temperature of 22 degrees C or less with a maximum daily average of no greater than 19 degrees C.

Turbidity

STREAM	WATER TEMP. C	pH	TURBIDITY	DO	# OF SAMPLES
Sevenmile Creek	53.8	7.6	27.9	8.4	9
Pattee Creek	53.6	7.7	7.2	8.0	4
McDevitt Creek	50.4	7.7	6.3	7.9	10
Henry Creek	53.8	7.7	5.1	8.0	9
Hawley Creek	48.1	8.0	5.1	7.9	7

62-4 There are no fish species of special concern that exist in the RMP area. Fisheries habitat exists throughout the RMP area and coexists with all other activities. Pages 3-17 and 3-18 of the Draft RMP/EIS describes the amount and condition of fisheries habitat in the RMP area. Response 62-3 describes the extent and type of water quality monitoring data being collected.

62-5 The term Critical Habitat was used incorrectly under Forest Management in Chapter 2 of the Draft RMP/EIS and has been corrected (see Correction Sheet). That term has specific legal connotations, solely with regard to federally listed threatened and endangered species. The U.S. Fish and Wildlife Service has not officially designated any of the subject area as Critical Habitat. Although the designation of crucial habitats is conventional, it frequently tends to imply (unfairly) that habitat not so designated is of significantly less value. That certainly is not uniformly true. Crucial ranges (habitats), as shown for deer and elk, are a reflection of data base depth which allowed for more refinement of use areas than for the other species. From a practical and operational standpoint, the ranges (habitats) displayed on maps C-3, C-4, and C-5 will be treated as crucial habitat until additional data allows more discrete delineation.

62-6 Appendix D of the Draft Lemhi RMP/EIS, Watershed Condition, takes into account soil erosion potential. Map D-1, Draft Lemhi RMP/EIS, highlights those areas.

62-7 Cumulative and combined effects are discussed in Table 2-1, Page 2-50 and throughout Chapter 4 of the Draft RMP/EIS.

The area analysis concept was not used in preparation of the RMP DEIS because it caused confusion and did little to improve understanding of the document. The Lemhi RMP area is less than 500,000 acres and by comparison to most national forests is very small.

The aerial coverage of a single evaluation will vary. The environmental analysis process used for evaluating activity plans and individual projects will be site specific in nature and could cover from 50,000 acres to less than one acre.

The period of time between planned activities will vary by the magnitude of the project.

The various activity plans will have significant cumulative effects, such as improved range condition, improved wildlife habitat condition, and improved water quality, as examples. The negative impacts of proposed actions are mitigated by use of standard operating procedures outlined in the Draft RMP/EIS or by special stipulations developed on a case-by-case basis.

Draft EAs are available for public review. We initiate public participation on major EAs such as major road construction to a large mine. EISs by law receive a higher level of public review and have formal public review requirements.

62-8 It is standard BLM policy, as outlined in Washington Office Instruction Memorandum No. 82-650, that "The proposed action shall be the continuation of the present management situation, based on the permittees' or lessees' active preference, previous years licensed use, or average actual use." Alternative A is the Proposed Action by this definition, but Alternative F is the Preferred Alternative. This refers to stocking levels as well as the range management program.

Table I-1, Appendix I of the Draft RMP/EIS shows that generally utilization levels up to 50% will be considered acceptable on native range. It also points out that special cases, riparian zones, meadow, etc. will require variations in allowable utilization levels. This variation could include total exclusion of livestock on riparian areas in poor condition or it could allow up to 70% utilization of a riparian area that was grazed only in the late fall. The management objective for each riparian zone will determine the amount of utilization that will be allowed.

62-9 The evaluation of only the various stocking levels is not the way impacts are evaluated in regard to riparian systems. The document takes into account the overall management of the riparian systems. For those grazing allotments with riparian problems (Table B-4, Draft RMP/EIS), Allotment Management Plans will be developed to meet riparian habitat objectives on a case-by-case basis. The standards and practices used to meet riparian objectives will vary. Scenarios of livestock grazing management to improve riparian areas include, but are not limited to:

> Prescribed burning has been shown to increase the nutrient content and palatability of forage. In some circumstances this can be a useful tool in drawing cattle away from riparian zones. It can also be used in conjunction with changes in season of use (i.e. early and late season use) to improve riparian zones.

Season of use changes are effective in some areas depending on pasture design and landtypes within the pasture. Grazing systems in nearby Dillon, Montana utilizing high intensity, short duration grazing during the early season have proven effective in improving riparian zones if utilization is limited to 40%.

Conscientious and dedicated riding and salting practices have been shown to be effective when utilization criteria can be strictly adhered to. Also see page 51 of the Draft Lemhi RMP/EIS.

62-10 It is the BLM's policy to comply with Executive Order 11990 and the Preferred Alternative F does (see Table 2-1, Draft RMP/EIS).

Under the proposed plan riparian condition would be improved to excellent condition on 225 acres where livestock will be totally excluded. An additional 275 acres of riparian area would improve through livestock management. Refer to response 62-9 and Analysis of Proposed Riparian Management Appendix, page A-8.

62-11 Riparian areas have been comprehensively treated throughout the document. Pages D-5 through D-9 in the Appendix section of the Draft Lemhi RMP/EIS, have addressed riparian areas independently from other resources. Appendix I, Draft Lemhi RMP/EIS would change if the preferred alternative was changed. Also see Analysis of Proposed Riparian Management Appendix, page A-8.

62-12 Variations are only limited by the imagination. Precipitation, elevation, slope, soils, vegetative components, season of use, and grazing intensity are only a few parameters that would influence the variations. Monitoring would ascertain whether the variations were compatible with management objectives. If not, appropriate changes could then be made accordingly.

62-13 General monitoring procedures are listed in Appendix I-1 of the Draft RMP/EIS. Refinements in monitoring will be made during the activity planning and environmental assessment phases of resource management implementation. See Response 62-2.

62-14 The cumulative effects are addressed in the EIS and will be referenced in the Standard Operating Procedures.

Cumulative and combined effects are discussed in Table 2-1, page 2-50 and throughout Chapter 4 of the Draft RMP/EIS. Chapter 4 begins with the impacts of Alternative A on page 4-3 and ends with Irreversible or Irretrievable Commitment of Resources on page 4-105 of the Draft RMP/EIS. The Preferred Alternative (Alternative F) is on pages 4-77 through 4-93 of the Draft RMP/EIS. The Standard Operating Procedures are on pages 58 through 80 of the Proposed RMP and Final EIS. Also refer to Table 2-1 Comparative Impact Summary, page 2-50 through 2-52 in the Draft RMP/EIS.

62-15 Surface disturbing activities are regulated under BLM's "Surface Management Regulations" found at 43 CFR 3802/3809.

The Federal Land Policy and Management Act of October 21, 1976, amended the mining laws by directing the Secretary of the Interior, by regulation or otherwise, to take any action necessary to prevent unnecessary or undue degradation of the lands. This final rulemaking implements that requirement and, among other things, requires mining claimants to complete reasonable reclamation on Federal lands administered by the Bureau of Land Management during and upon termination of exploration and mining activities under the mining laws. This rulemaking pertains to locatable minerals such as gold, lead, silver, uranium, etc. It does not pertain to coal, oil, gas, phosphate or other leasable minerals or salable minerals such as sand and gravel.

It should be made clear that the purpose of these regulations is only to minimize the environmental effects of mining operations. Miners have a statutory right to enter upon, explore, locate and purchase under the mining laws those public lands that are open to mining.

Three distinct levels of mining activity have been recognized.

1. Casual Use - No Notice or Plan Required

   Designed for part-time miners or weekend prospectors who do only negligible disturbance. Mechanized earth-moving equipment and explosives are not allowed under casual use. Operators need not contact BLM.

2. Surface Disturbance of Less Than 5 Acres - Notice Required

   When operators propose to conduct exploration or mining activities which cause a surface disturbance of 5 acres or less per year (except on special category lands) they must only submit a written letter or "Notice" to BLM 15 days prior to starting operations. The Notice must describe the operations and their location and must contain a statement that the lands will be reclaimed to the standards spelled out in the regulations. No approval or bonding is required but BLM may request a meeting with the operator when road construction exceeds a certain level. This consultation is designed to select the best possible location for access to the area of operations. Further, the 15 days is designed to give BLM adequate time to inform the operator about other resource values that may be in the area and those which, if possible, should be avoided. The operator must notify BLM when reclamation is complete so an inspection can be made.

A. The following standards govern activities conducted under a notice:

(1) Access routes shall be planned for only the minimum width needed for operations and shall follow natural contours, where practicable to minimize cut and fill.

(2) All tailings, dumps, deleterious materials or substances, and other waste produced by the operations shall be disposed of so as to prevent unnecessary or undue degradation and in accordance with applicable Federal and State Laws.

(3) At the earliest feasible time, the operator shall reclaim the area disturbed, except to the extent necessary to preserve evidence of mineralization, by taking reasonable measures to prevent or control on-site and off-site damage of the Federal lands.

(4) Reclamation shall include, but shall not be limited to:

a) Saving of topsoil for final application after reshaping of disturbed areas have been completed.

b) Measures to control erosion, landslides, and water runoff.

c) Measures to isolate, remove, or control toxic materials.

d) Reshaping the area disturbed, application of the topsoil, and revegetation of disturbed areas, where reasonably practicable.

e) Rehabilitation of fisheries and wildlife habitat.

(5) When reclamation of the disturbed area has been completed, except to the extent necessary to preserve evidence of mineralization, the authorized officer shall be notified so that an inspection of the area can be made.

B. Operations conducted pursuant to this subpart are subject to monitoring by the authorized officer to ensure that operators are conducting operations in a manner which will not cause unnecessary or undue degradation.

C. Failure of the operator to complete reclamation to the standards described in this subpart may cause the operator to be subject to a notice of noncompliance as described in §3809.3-2 of this Part.

3. Disturbance of More Than 5 Acres or Mining in Special Area - Plan of Operations Required

A plan of operations must be submitted if surface disturbance exceeds 5 acres per year, or if the operations are proposed in:

- Wild and Scenic River Areas
- Areas of Critical Environmental Concern
- National Wilderness Preservation System
- Off-road vehicle "closures" or "limited" areas
- Areas withdrawn from mining where valid existing rights are being exercised

The plan must describe the entire operation to include equipment, location of access, support facilities, drill sites (to the extent possible), measures to prevent unnecessary or undue degradation and reclamation.

The above has been quoted from: "Surface Management of the Public Lands under U.S. Mining Laws (43 CFR 3809)" fact sheet #12, 03/81, BLM Publication.

The comment asks if Notices and Plans of Operation are reviewed by the public and other agencies. In general a Notice simply puts the BLM on "Notice" that some work will be undertaken. The BLM neither approves nor disapproves a Notice. While many Notices are reviewed in the field with operators, there may be instances when workload will not allow examination of all the Notices received. In general, emphasis is placed on Notices received for areas that have known occurrences of threatened and/or endangered species or cultural resource values known to be significant. Most Plans of Operation require and environmental assessment or EIS prior to approval. The level of public and other agency involvement is governed by the level of complexity of the Plan and the level of impact the operation will have on other resources.

BLM can attach any stipulation to a right-of-way that is necessary to mitigate adverse impacts. Stipulations are developed on a case-by-case basis. Stipulations can also be added to plans of operation where the plan does not sufficiently mitigate impacts to other resources. Reclamation bonding can be added to any Plan of Operations but present BLM policy discourages bonding and favors civil actions against operators who do not reclaim their work.

Standard stipulations for oil and gas leasing (geothermal leasing also) were developed during the District-wide oil and gas leasing Environmental Assessment. The stipulations will be included as part of the Standard Operating Procedures.

62-16 The waivers discussed are not significant in nature to warrant modification in the RMP document and are handled on a case-by-case basis through the Environmental Assessment process. This process does include requirements for coordination with appropriate agencies. The objective of this statement is to eliminate unwarranted stipulations due to changing conditions. An example would be to restrict exploration activity on big game winter range. It is reasonable to restrict exploration activity when it impacts wintering wildlife, but if conditions have changed and wildlife is not present and no impact would occur, then the restriction is unreasonable.

62-17 Old growth timber presently encompasses the vast majority of timber stands within the planning area. Management of this habitat will be determined as part of a site specific analysis performed at the timber sale planning level. We anticipate no shortage of old growth stands in any forested drainage during the life of this plan.

The existing reforestation "backlog" is primarily a result of the high-grading selection cuts of the 1950's and 1960's in which harvesting systems were product oriented and not silviculturally designed to encourage regeneration. The term "backlog" is a little misleading as most of the areas we refer to are stocked with a residual overstory and await removal once the understory becomes stocked and established. The backlog is actually a delay in the regeneration process resulting from a poorly planned initial harvest and is not indicative of a denuded or unforested condition. Much of this backlog is regenerating naturally but recovery is slow. Those areas not recovering are being planted as funding allows. Present and future harvests follow strict silvicultural prescriptions designed to encourage natural regeneration. Proper application of multiple-entry shelterwood systems should provide a favorable environment for the natural regeneration of future harvested areas.

62-18 The rationale for the slope restrictions on tractor skidding is based on the erosion hazards of the various land types in the area. The volcanic, granitic, and sediment land types are highly erodible and subject to erosion when slopes over 45 percent are disturbed by tractor operations. The more stable quartzites are less subject to erosion of disturbed areas and allow mechanical disturbance on steeper slopes up to 60 percent. The erosion hazard of tractor operations on slopes greater than these limitations are sufficient enough to warrant more restrictive measures. Through the use of cable yarding methods, these steeper slopes can be successfully logged without the soil disturbance and the potential erosion resulting from tractor operations.

62-19 The protective standards for timber harvest in riparian areas are established by the Idaho Forest Practices Act, Title 38, Chapter 13, Idaho Code. These rules and regulations apply to all BLM

timber harvest operations within the State of Idaho. Reference to these regulations will be noted in the Standard Operating Procedures of the Proposed RMP.

62-20 Normally "unsatisfactory resource conditions" would not require temporary suspension or closure to livestock use, but would require a change or improvement in grazing management that would lead to "improved resource conditions". Also, "Environmental Protection Consideration" is part of Item 1, Allotment-Specific Management Objectives, and are outlined by allotments in Table B-4 of the Draft RMP/EIS. All grazing systems will be designed with environmental protection as part of the objective.

62-21 Activity plans such as habitat management plans are written to provide for detailed site specific guidance for meeting specific resource objectives. These plans are analyzed through the environmental assessment process, are available for public review and, in many cases, are prepared with public and other agency participation.

62-22 See Response 62-15 and 62-16.

62-23 Moist sites would include areas where an elevated water table changes the vegetative component. In accordance with the Idaho Forest Practices Act, we would consider leaving buffer strips along lakes, bogs, swamps, wet meadows, springs, seeps, or other sources where the presence of water is indicated. Protection of soil and vegetation from disturbance which would cause adverse affects on water quality, quantity and wildlife and aquatic habitat would be avoided. The final decision on areas where buffer strips are needed would be made by the Area Manager at the recommendation of the hydrologist, fisheries and/or wildlife biologist, and forester.

62-24 Erosion on timber sale areas and mining operations would be kept to an acceptable level by following SOPs outlined for these resource activities. Additional concerns and mitigating measures would be outlined during environmental analysis. There is one municipal watershed within the RMP area. We manage a very small portion of the watershed and will address this issue during AMP development.

Soils-loss tolerance is the amount of soil that can be lost in tons per acre per year and still maintain a high level of productivity over a long period of time. Establishment of tolerances for specific soils and topography has been largely a matter of collective judgement. Both physical and economical factors are considered. For soils in the United States, the maximum soil-loss rates thus determined range from 1 to 5 tons per acre per year, depending on soil properties, soil depth, topography, and prior erosion. In areas where pollution by sediment is critical, tolerance may be established based on reducing sediment pollution

rather than for maintaining soil productivity. Erosion from timber management operations and mining operations would meet Idaho water quality standards by stipulating mitigation necessary for achieving those standards.

62-25 This is only a partial list and is not all inclusive. Other management plans have been identified throughout the document. There are four watershed activity plans identified in the RMP.

62-26 See Standard Operating Procedures, Page 53 and 54, Draft RMP/EIS. Also see response 62-3.

62-27 See Response 54-1.

62-28 Short-term use versus long-term productivity is only evaluated for the Preferred Alternative as required by 40 CFR 1502.16.

62-29 Since riparian areas are usually small areas and are a continuum of surrounding drier land types, giving acreage figures with any degree of confidence is impossible. See Response 47-14.

All of the alternatives are reasonable. The preferred alternative will provide for some riparian improvement without total exclusion of livestock and in this case, 275 acres is a realistic amount of improvement under those constraints. See Response 5-5 and Analysis of Proposed Riparian Management Appendix, page A-8.

62-30 There are no Critical Habitats defined in the document. Also, there are no Critical Habitats within the Lemhi RMP Area. ACEC's were considered when developing the Lemhi RMP, but no resource values were found that required management through ACEC designation. See response 62-5. See also page 19 of the Draft RMP/EIS and the "Questions and Concerns Not Addressed" section of the Proposed Plan for information concerning ACECs.

62-31 Sagebrush canopy coverage requirements were obtained via contacts with recognized authorities on antelope and sage grouse and from habitat management guidelines published for the two species. Primary references used for antelope included Habitat Management Guides for the American Pronghorn Antelope (USDI-BLM Tech. Note 347) and Guidelines for the Management of Pronghorn Antelope (8th Pronghorn Antelope Workshop, 1978). Habitat Requirements and Management Recommendations for Sage Grouse (USDI-BLM Tech. Note), Sage Grouse Management Practices (Western States Sage Grouse Committee, Tech. Bul. 1), and Sage Grouse (PNW Forest and Range Exp. Sta. Gen. Tech. Rpt. 187) were used for Sage Grouse.

62-32 This comment will be passed on to the BLM State Office in Boise for further consideration.

62-33 See Response 16-3.

62-34 See Response 62-8.

62-35 So noted. The statement will be amended on the Correction Sheet to read: "The timber industry in Lemhi County is already in a severely depressed condition. This alternative would have reduced the availability of economically viable timber sales and thus would have been unacceptable to the people of Lemhi County."

62-36 The statement will read: "No significant conflicts with other resources were identified at the proposed stocking level".

62-37 Good point. We will eliminate the phrase, "if practical", from the text.

62-38 You are correct that our economic section only reflects the economic value accrued on BLM land. The scope of our management and inventory process dictates that that is all we can accurately predict. A comment to the effect that other values exist may be appropriate, but for the purposes of our analysis only those values that are directly associated with federal lands will be analyzed.

63-1 See the Implementation Section of the Proposed RMP.

63-2 AMP's will be developed on each Improve-category allotment. All AMP's will be developed in concert with Wildlife Habitat Management Plans and Watershed Activity Plans. The Watershed Activity Plans will include the concerns of fisheries and riparian area management. Also, the Department of Fish and Game will be consulted. All AMPs will be developed through consultation and coordination with the affected livestock operators.

63-3 All of the alternatives are realistic and the costs are compared in Chapter 4. Yes, you are correct in that it costs more to provide AMP's. Funds are going to have to be expended to provide facilities. In order to insure proper range management without initiating Alternative F/G, much more severe grazing reductions would have to be imposed to improve other multiple use values.

Funds will be expended for activity plans and project development in Range, Wildlife, Recreation, Watershed, and Cultural (see Table 4-25 on Page 4-91 of the Draft Lemhi RMP/EIS). These funds will be expended over the 20-year life of the plan to provide allotment management plans, range improvements, wildlife habitat, watershed protection, recreational facilities, and cultural resource protection (see Table S-1). The total project development cost for range is $787,947. This would amount to $39,397 per year over the 20-year life of the plan.

63-4 Wildlife and recreation are funded through general appropriations.

63-5 The proposed stocking level in Alternative F is based on the physiological requirement of the base resource, namely the plants. Wildlife habitat and aesthetics are expected to improve also. However, the overriding concern is to improve the base resource. Any adjustments will be made after monitoring on a case-by-case basis.

63-6 Habitat will be provided for wildlife numbers arrived at cooperatively by BLM, Fish and Game, and the public.

63-7 With the estimated game populations and the seasons the animals are on the public lands, we can estimate the forage needed by wildlife. See also Response H3-1.

63-8 See Response H1-3.

63-9 All of the I-category allotments will receive AMP's. Where practical, spring turnout units will be rotated or deferred. Where not practical, adjustments in turnout dates will be made.

63-10 Water resources is one of the many multiple use considerations for public lands. See responses 47-31 and 52-1.

63-11 In all alternatives, lands are identified for public sale, exchange, Desert Land Entry, etc., for a balanced lands program.

63-12 Rationale for selection of the Preferred Alternative are in Part I, Pages 31-38 of the Draft RMP/EIS.

63-13 Fencing is one of many ways proposed to improve riparian zones. Fencing has been proposed only as a last resort. Riparian habitat improvements will be developed through AMP's. See also Response 11-1.

64-1 See Response 47-22.

APPENDIX

TABLE 4

PROPOSED PLAN
BIG GAME FORAGE DEMAND BY ALLOTMENT
(AUMs in Cattle Equivalent)

ALLOTMENT	SPECIES	AUM'S
Tower Creek	Deer	100
	Elk	27
	Antelope	2
		129
Badger Springs	Deer	167
	Elk	40
	Antelope	6
		213
Bird Creek	Deer	41
Diamond Creek	Deer	10
Freeman Creek	Deer	9
	Elk	69
		78
South Carmen Creek	Deer	163
	Elk	27
	Antelope	10
		200
Deriar Creek	Deer	17
Fenster Creek	Deer	2
Kirtley Creek	Deer	4
	Antelope	3
		7
Joe Moore	Deer	19
	Elk	16
	Antelope	5
		40
Geertson Creek	Deer	37
	Elk	13
	Antelope	9
		59
Bob Moore	Deer	18
Chipps Creek	Deer	49
Bohannon Creek	Deer	29
	Elk	42
	Antelope	3
		74
WF Whimpey Cr.	Deer	633
	Elk	21
	Antelope	4
		88
Coal Mine Gulch	Deer	44
	Antelope	4
		48
Hot Springs	Deer	161
	Antelope	16
		177
Perreau Creek	Deer	36
Henry Creek	Deer	23
	Elk	46
		69
Lake Creek	Deer	93
	Elk	8
		101

T = Trace

TABLE 4 (Continued)

PROPOSED PLAN
BIG GAME FORAGE DEMAND BY ALLOTMENT
(AUMs in Cattle Equivalent)

ALLOTMENT	SPECIES	AUM'S
EF Whimpey Creek	Deer	24
	Elk	10
	Antelope	2
		36
Pratt Creek	Deer	77
	Elk	30
	Antelope	2
		109
Pronghorn	Deer	15
	Elk	17
	Antelope	T
		32
County Road	Deer	15
	Antelope	T
		15
Baker Creek	Deer	69
	Elk	43
	Antelope	10
		122
Williams Creek	Deer	50
	Elk	31
		81
Baldy Basin	Deer	95
	Elk	222
	Antelope	10
		327
McDevitt Creek	Deer	158
	Elk	131
	Antelope	8
		297
Indian Head	Deer	22
	Antelope	17
		39
Tenmile	Deer	33
	Antelope	2
		35
Wimpey Creek	Deer	6
	Elk	10
	Antelope	3
		19
Haynes Creek	Deer	47
	Elk	43
	Antelope	10
		100
Dummy Creek	Antelope	2
Lower Basin	Deer	37
	Elk	53
	Antelope	5
		95
Everson Creek	Antelope	T
Big Eightmile	Antelope	T
Nef #1	Antelope	T
Nef #2	Antelope	1
Dump	Deer	10
	Antelope	1
		11

T = Trace

TABLE 4 (Continued)

PROPOSED PLAN
BIG GAME FORAGE DEMAND BY ALLOTMENT
(AUMs in Cattle Equivalent)

ALLOTMENT	SPECIES	AUM'S
Grouse Creek	Deer	137
	Elk	37
	Antelope	8
		182
Rooster Comb	Deer	53
	Elk	94
	Antelope	4
		151
Little Sawmill	Deer	33
	Elk	63
	Antelope	20
		116
Mill Creek	Antelope	3
Walters	Antelope	3
Big Springs	Antelope	2
Horse Heaven	Antelope	6
Mammoth/Sawmill	Antelope	24
Purcell Creek	Deer	16
	Antelope	2
		18
Hawley Creek	Deer	53
	Elk	65
	Antelope	3
	Bighorn	30
		151
State Section	Antelope	2
Pattee Creek	Deer	77
	Elk	77
	Antelope	10
		164
Deer Park	Antelope	T
Adams Creek	Antelope	1
Milk Creek	Antelope	T
Timber Creek	Deer	76
	Antelope	10
		86
Squaw Creek	Elk	77
	Antelope	T
		77
Nez Perce	Antelope	27
Coal Kiln	Antelope	14
Smelter Gulch	Deer	42
	Antelope	17
		59
Cottonwood	Elk	35
	Antelope	32
		67

T = Trace

TABLE 4 (Continued)

PROPOSED PLAN
BIG GAME FORAGE DEMAND BY ALLOTMENT
(AUMs in Cattle Equivalent)

ALLOTMENT	SPECIES	AUM'S
Leadore Hill	Deer	15
	Antelope	1
		16
Sandy Creek	Deer	63
	Elk	38
	Antelope	2
		103
Kinney Creek	Deer	13
	Elk	16
	Antelope	2
		31
Rattlesnake	Deer	20
	Elk	33
	Antelope	2
		55
Warm Springs	Deer	94
	Elk	44
	Antelope	15
		153
Lower Reese	Antelope	2
Leadville	Deer	100
	Antelope	2
	Bighorn	25
		127
Little Eightmile	Deer	42
	Antelope	2
		44
Gould Basin	Deer	79
	Elk	35
	Antelope	5
		119
Pritchard Gulch	Deer	7
	Elk	16
	Antelope	2
		25
Dry Canyon	Deer	11
	Elk	27
	Antelope	2
		40
Napo Canyon	Deer	27
	Elk	59
	Antelope	2
		88
Yearian Creek	Deer	151
	Elk	127
	Antelope	16
		294
Tex Creek	Antelope	2
Chamberlain Creek	Deer	69
	Elk	143
	Antelope	10
	Bighorn	17
		239
Mollie Gulch	Deer	31
	Antelope	2
		33

T = Trace

TABLE 4 (Concluded)

PROPOSED PLAN
BIG GAME FORAGE DEMAND BY ALLOTMENT
(AUMs in Cattle Equivalent)

ALLOTMENT	SPECIES	AUM'S
Cedar Gulch	Deer	26
	Elk	11
	Antelope	2
		39
Jakes Canyon	Deer	4
	Antelope	T
		4
Center Ridge	Antelope	14
Leadore	Deer	14
	Antelope	1
		15
Bull Creek	Deer	66
	Elk	130
	Antelope	1
	Bighorn	10
		207
Powderhorn	Deer	243
	Elk	359
	Antelope	1
	Bighorn	40
		666
Spring Canyon	Antelope	29

T = Trace

TABLE 5
ALLOTMENT SUMMARY

ALLOTMENT NAME	ALLOT. #	BLM ECOLOGICAL CONDITION					MANAGEMENT STATUS	ACTIVE PREFERENCE AUMS	SHORT-TERM AUMS	LONG-TERM AUMS	ACRES IMPROVED
		EXCELLENT	GOOD	FAIR	POOR	UNMAPPED					
Tower Creek	6101	39	4,241			129	I	652	441	490	0
Badger Springs	6102	440	7,413	1,168		189	I	1,490	1,168	1,490	100
Bird Creek	6103		513	731		476	I	129	129	144	100
Dismood Creek	6104		133	100	46	30	C	30	30	30	0
Freeman Creek	6105		316	164		1,439	I	131	131	131	16
South Carmeo Creek	6106		5,680	7,396		1,966	I	2,309	1,563	1,720	750
Deriar Creek	6107		265	587			I	160	85	93	100
Fenster Creek	6108		137	68			C	58	58	58	0
Kirtley Creek	6109		979	25		1,193	C	257	257	257	0
Geertsoo Creek	6110		2,360	4,597		4,805	I	938	938	938	450
Bob Moore	6111		164	686	149	149	I	154	115	125	375
Chipps Creek	6112		119	1,168		382	C	42	42	42	0
Bohaoooo Creek	6113		2,016	734		3,499	M	842	842	842	0
West Fork Wimpey Creek	6114		226	455		2,069	I	100	75	100	100
Coal Mioe Gulch	6115		586	816		54	I	156	117	156	150
Hot Spriogs	6116		2,400	5,898		1,225	I	925	635	794	3,932
Perreau Creek	6117		860	1,291		43	I	175	146	193	300
Joe Moore	6118		807	1,444		12	I	280	226	251	750
East Fork Wimpey Creek	6119			437		1,255	M	153	86	117	100
Prstt Creek	6120			2,032		2,287	I	747	353	389	200
Pronghorn	6121			499		272	M	286	101	101	0
Couoty Road	6122			335		27	C	66	33	33	0
Baker Creek	6123		2,859	2,449		191	I	1,090	550	611	1,000
Willisms Creek	6124		459	1,302		1,106	I	378	287	319	600
Heory Creek	6125	220	808			431	M	240	240	240	0
Lake Creek	6126		253	2,017		194	I	224	168	168	1,000
Teo Mile	6127		528			938	M	30	30	30	0
Wimpey Creek	6128		701	511		792	I	155	155	155	50
Dummy Creek	6129		234	582		1,996	I	87	87	87	400
Haynes Creek	6201	168	6,322	506		161	M	1,366	1,366	1,366	0
Lower Basio	6202		2,025	815		54	I	783	500	693	100
Baldy Basio	6203	273	7,008	2,949	53	1,324	I	1,940	1,217	1,339	353
McDevitt Creek	6204	47	9,336	3,990			I	2,203	1,486	1,635	400
Grouse Creek	6205		9,445	7,477		695	I	2,206	1,468	1,919	750
Basio Creek	6206					67	C	50	50	50	0
McNutt Creek	6207		638				C	88	88	88	0
Roostercomb	6208		2,204	4,511		273	I	1,287	776	1,230	0
Little Sawmill	6209		5,247	3,657		214	I	1,532	1,021	1,152	350
Mill Creek	6210		321			23	C	90	38	42	0
Walters	6211		1,427			276	I	524	189	208	0
Lee Creek	6212		458	1,621		70	I	518	239	262	150
Big Springs	6213			701	341		M	188	148	163	0
Horse Heaven	6214			1,484			I	96	96	96	150
Eversoo Creek	6215					279	C	85	26	29	0
Big Eightmile	6216					315	C	53	41	45	0
NEF #1	6217			119			C	11	11	12	0
NEF #2	6218			320			C	100	36	40	0
Dump	6219			361			C	30	25	25	0
State Sectioo	6220			434			C	45	40	45	0
Deer Park	6221			222		12	C	40	26	29	0
Adams Creek	6222		171	63			C	27	27	29	0

I = Improve
M = Maiotsio
C = Custodial

TABLE 5 (Continued)
ALLOTMENT SUMMARY

ALLOTMENT NAME	ALLOT. #	BLM ECOLOGICAL CONDITION					MANAGEMENT STATUS	ACTIVE PREFERENCE AUMS	SHORT-TERM AUMS	LONG-TERM AUMS	ACRES IMPROVED
		EXCELLENT	GOOD	FAIR	POOR	UNMAPPED					
Milk Creek	6223			844			I	100	70	100	0
Timber Creek	6224		2,069	4,793		85	I	883	695	765	500
Leadore Hill	6225		884	1,212		617	I	114	114	114	0
Sandy Creek	6226		3,333	219		53	M	483	398	438	22
Kinney Creek	6227		389	481			M	144	144	144	50
Rattlesnake	6228		1,038	327		9	M	266	207	207	0
Warm Springs	6229		3,245	3,374			I	2,250	736	810	350
Pattee Creek	6230		3,930	1,331		120	I	998	592	652	150
Gould Basin	6231		5,427	1,690	31	65	M	971	872	971	31
Squaw Creek	6232		6,254	1,161		57	I	1,510	872	960	100
Pritchard Gulch	6233		1,083			653	I	416	377	416	0
Big Dry Canyon	6234		1,060	167		853	I	288	139	139	100
Napo Canyon	6235		1,665	3,320		350	I	573	356	445	50
Yearian Creek	6236		11,796	7,973		5,109	I	3,494	2,300	2,764	800
Lower Reese Creek	6237			982		170	M	60	41	60	0
Cedar Gulch	6238		1,062	1,365		233	I	190	160	190	150
Little Eightmile	6239		2,755	7		137	I	287	193	287	0
Mollie Gulch	6240		2,331	304		68	I	240	225	240	50
Jakes Canyon	6241			532		14	M	31	31	31	0
Turner	6242			119			C	17	17	17	0
Pree Strip	6301		2,665	1,224			I	728	432	475	300
Leadore	6302			586	268	232	M	28	18	28	418
Leadville	6303		1,101	4,466		1,228	I	528	453	566	1,100
Hawley Creek	6304		439	6,646		236	I	625	488	610	1,000
Bull Creek	6305		1,086	221		510	I	235	141	235	100
Tex Creek	6306		1,899	782			I	264	249	262	100
Powderhorn***	6307	38	16,620	10,235		1,872	I	5,035	3,196	3,517	1,000
Chamberlain Creek***	6308	897	15,226	770		2,740	I	1,456	1,456	1,456	0
Center Ridge	6309		15,781	150			M	2,333	1,770	1,947	50
Spring Canyon	6310		21,554	1,569			I	3,379	2,569	2,826	500
Cottonwood***	6311	202	19,252	4,032	48	124	I	4,298	2,628	5,519	300
Smelter Gulch	6312		9,921	1,834		346	I	732	732	752	400
Indianhead	6313		9,292	2,536			I	1,308	986	1,308	500
Mammoth/Sawmill	6314		15,207	859			I	2,465	1,370	1,783	300
Coal Kiln	6315		5,605	3,482			I	620	422	606	900
Purcell Creek	6316		198	576	128		M	28	28	28	0
Nez Perce	6317		3,381	23		405	I	977	423	466	0

*** Part of this allotment is in the Wilderness Study Area.

EIGHTEENMILE WILDERNESS STUDY AREA

ALLOTMENT NAME	ALLOT. #	BLM ECOLOGICAL CONDITION					MANAGEMENT STATUS	ACTIVE PREFERENCE AUMS	SHORT-TERM AUMS	LONG-TERM AUMS	ACRES IMPROVED
		EXCELLENT	GOOD	FAIR	POOR	UNMAPPED					
Powderhorn	6307	38	10,551	10,170		1,872	I	1,073	681	750	0
In Eighteenmile WSA			6,069	65							
Chamberlain Creek	6308		4,929	256			I	1,108	1,108	1,108	0
In Eighteenmile WSA		897	10,297	514		2,740					
Cottonwood	6311	202	15,931	3,013	48	123	I	788	482	530	0
In Eighteenmile WSA			3,321	1,019							

I = Improve
M = Maintain
C = Custodial

ANALYSIS OF PROPOSED RIPARIAN MANAGEMENT

Riparian management is a common issue of public interest. A large number of letters were received that addressed riparian management during the public comment period. This appendix is in response to those comments and provides additional information on the situation and the proposed program.

Under the proposed plan, 225 acres of riparian area would be improved by fencing to exclude livestock. Riparian improvement on an additional 275 acres would occur through implementation of Allotment Management Plans (AMPs) that specifically address management objectives for riparian areas.

The majority of the riparian areas in the Resource Area are in unsatisfactory condition. These areas consistently receive much higher use than surrounding upland areas.

Most grazing on federal land occurs during the months of May through September. Grazing during the hottest time of the year concentrates livestock in riparian areas where succulent forage, water and shade are in close proximity. The steep terrain common in much of the RMP area further concentrates the livestock in these areas.

Historically, domestic livestock grazing incorporated the use of both cattle and sheep. Sheep would range away from water and utilize steeper areas. Cattle continued to heavily use riparian zones. Changes in the profitability of cattle in comparison to sheep has almost eliminated sheep on these ranges. The result has been less pressure on upland range sites, but continued heavy pressure by cattle on riparian areas. Our information indicates that many upland range sites are in better condition now than in many years, although very limited or no improvement in riparian areas has occurred. Riparian condition is still declining in some areas.

The BLM has a number of administrative issues to address before a program of sound riparian management can be initiated. First there is a need to determine resource capabilities and potential. AMPs will be written beginning with high priority "I" category allotments. A key objective of the AMP will be improving riparian areas. Once the AMP is written, a five year monitoring study requirement is necessary before livestock use adjustments can be made.

The location of BLM managed stream segments and varied land ownership pattern will complicate the management in some areas. It is extremely common for a stream to originate on National forest and cross through several BLM allotments dissecting private, state, and BLM lands. Small allotments where riparian improvement is difficult or impossible because of the area's size will be looked at and evaluated for possible combination with other allotments.

In some areas, season of use limitations and the very nature of riparian areas will be major hurdles. "Ribbon" streams as well as riparian areas that are dispersed throughout allotments and pastures are common throughout the Resource Area.

The benefits of riparian zones are many. Cattle weight gains are significantly reduced when cattle are allowed to remain concentrated in riparian areas after that point in time when riparian zones become degraded. Riparian zones act as mini-reservoirs and can store an incredible amount of water. Many ranchers and farmers could realize extra revenue from higher yields of agricultural crops due to this extra stored water. This is especially true in drought years.

Healthy riparian areas slow water down and lessen the harmful effects of erosion and flooding. Areas that are prone to flooding would not be damaged as severely in areas with healthy riparian areas. Water quality is better because the vegetation acts like a sieve or strainer and filters out many undesirable chemicals, bacteria, and sediment. This is important, not only for fisheries habitat, but also for recreational and drinking water quality. Other riparian benefits are associated with wildlife. A very high percentage of wildlife species are reliant upon healthy riparian areas during some phase of their life cycle. The benefits for them are the same as for livestock in that food, water, and cover are all readily available.

The quality and quantity of forage in good condition riparian areas is superior to those riparian zones that have been degraded. Within the RMP area, Kentucky bluegrass (Poa pratensis) is currently the dominant grass in most riparian areas. Although appearing to be a robust plant, it provides little biomass in comparison to native grasses such as tufted hairgrass (Deschampsia caespitosa).

The first step in resolution of the riparian problem is to determine the riparian resource capabilities. This will include an inventory of what is available and what types of changes will be needed to rectify problems as well as a timetable for improvement.

The second step will require writing AMPs and making appropriate adjustments either in grazing allotment boundaries, area of use, or season of use. Livestock management changes such as herding may also be needed.

Monitoring of grazing utilization and livestock movement patterns as it relates to riparian zones will be the next step. There is currently a five year monitoring study requirement before most livestock use adjustments can be made.

There will be socio-economic impacts to area permittees. Many ranchers in the RMP area are small single family operators and rely little on hired help. They turn cows out onto public rangelands and then are forced to concentrate the majority of their activities on irrigation and haying. Modifications in the amount of time they spend in herding cattle or hiring a herder may be necessary. Pooling resources where several ranchers go together to hire a range rider may be a possible solution.

Even larger operations shift emphasis almost entirely to other farming activities and once again modifying the amount of time spent herding cattle may be necessary.

In the past, the BLM has reduced larger common use allotments into smaller individual allotments in order to reduce or eliminate conflicts between range users. A reversal of this trend may be necessary in many instances to achieve riprarian improvement without excluding livestock.

Methods proven to be successful in improving riparian areas with livestock grazing include short duration, high intensity grazing in the early or late season with utilization levels of approximately 40 percent. All socio-economic impacts will require consultation, coordination, and cooperation to maintain a good working relationship with affected parties and minimize adverse impacts.

Riparian improvement will be the end result of this long and sometimes complicated process. Even after a system designed to improve riparian areas is fully operational, five years is not an unreasonable timeframe for achieving this improvement.

The District is firmly committed to improving riparian habitat and will take the actions necessary to meet program objectives within existing capability.

*U.S. GOVERNMENT PRINTING OFFICE: 1986-0-693-057/42,001

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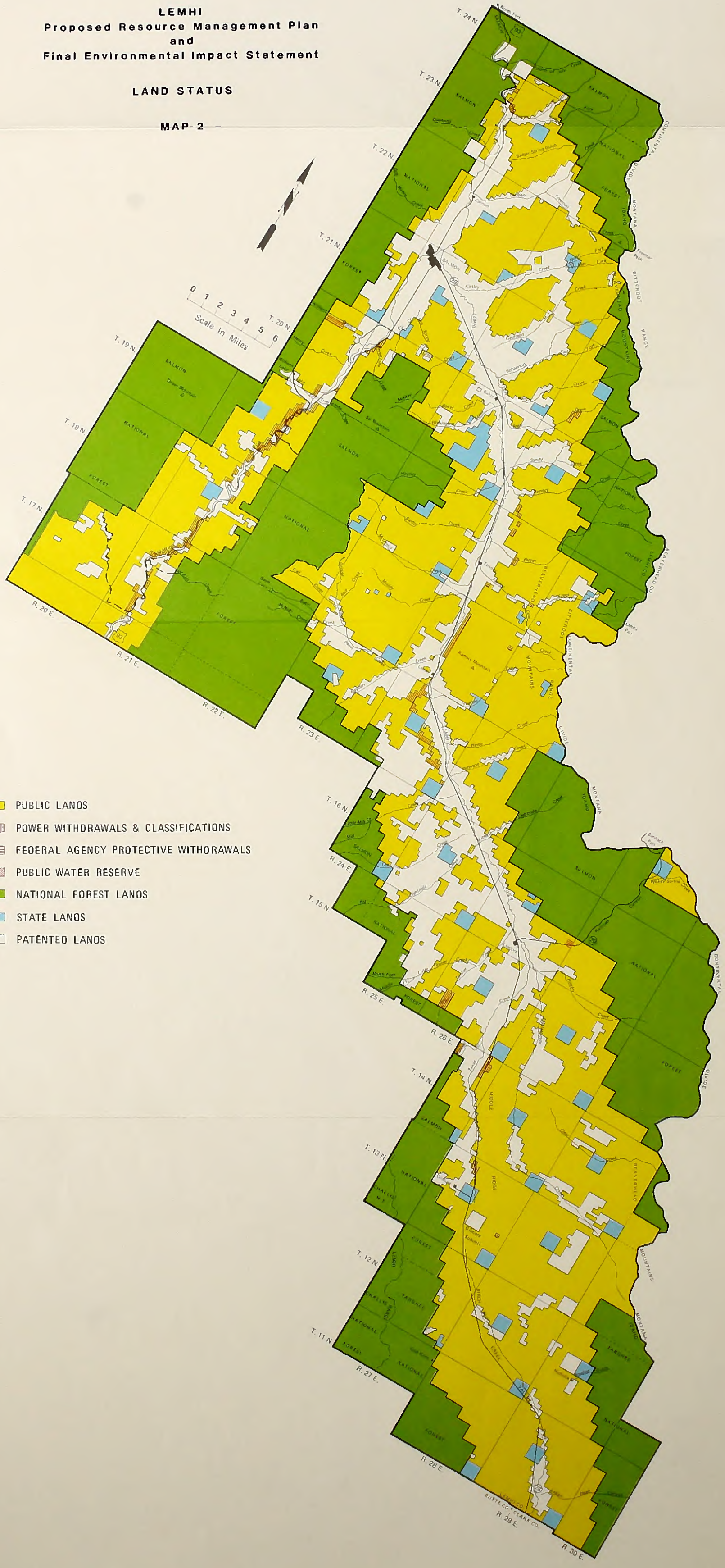
LAND STATUS

MAP 2



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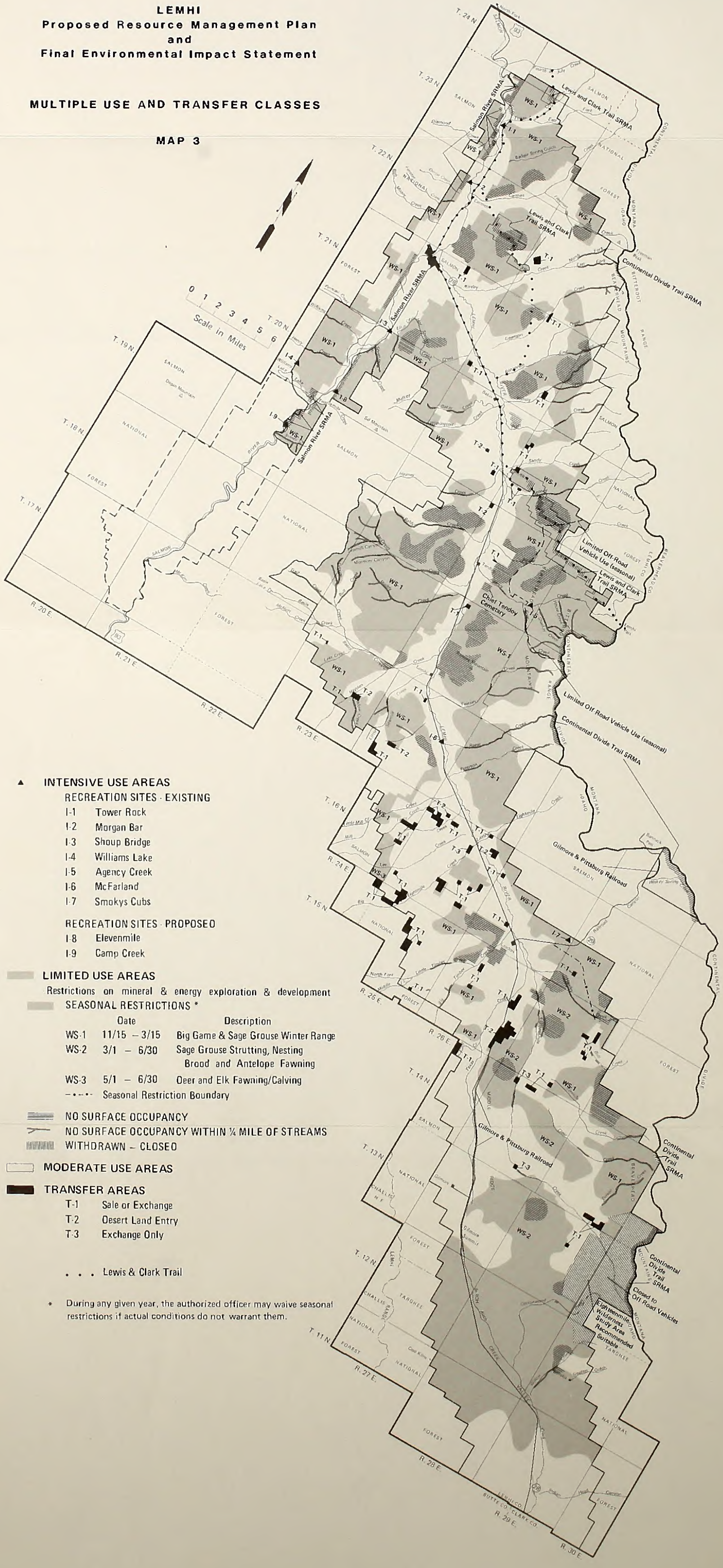
MULTIPLE USE AND TRANSFER CLASSES

MAP 3



▲ **INTENSIVE USE AREAS**

RECREATION SITES · EXISTING

- I-1 Tower Rock
- I-2 Morgan Bar
- I-3 Shoup Bridge
- I-4 Williams Lake
- I-5 Agency Creek
- I-6 McFarland
- I-7 Smokys Cubs

RECREATION SITES · PROPOSED

- I-8 Elevenmile
- I-9 Camp Creek

LIMITED USE AREAS

Restrictions on mineral & energy exploration & development

SEASONAL RESTRICTIONS *

	Date	Description
WS-1	11/15 – 3/15	Big Game & Sage Grouse Winter Range
WS-2	3/1 – 6/30	Sage Grouse Strutting, Nesting Brood and Antelope Fawning
WS-3	5/1 – 6/30	Deer and Elk Fawning/Calving

– • – • – Seasonal Restriction Boundary

NO SURFACE OCCUPANCY

NO SURFACE OCCUPANCY WITHIN ¼ MILE OF STREAMS

WITHDRAWN – CLOSED

MODERATE USE AREAS

TRANSFER AREAS

- T-1 Sale or Exchange
- T-2 Desert Land Entry
- T-3 Exchange Only

. . . Lewis & Clark Trail

* During any given year, the authorized officer may waive seasonal restrictions if actual conditions do not warrant them.

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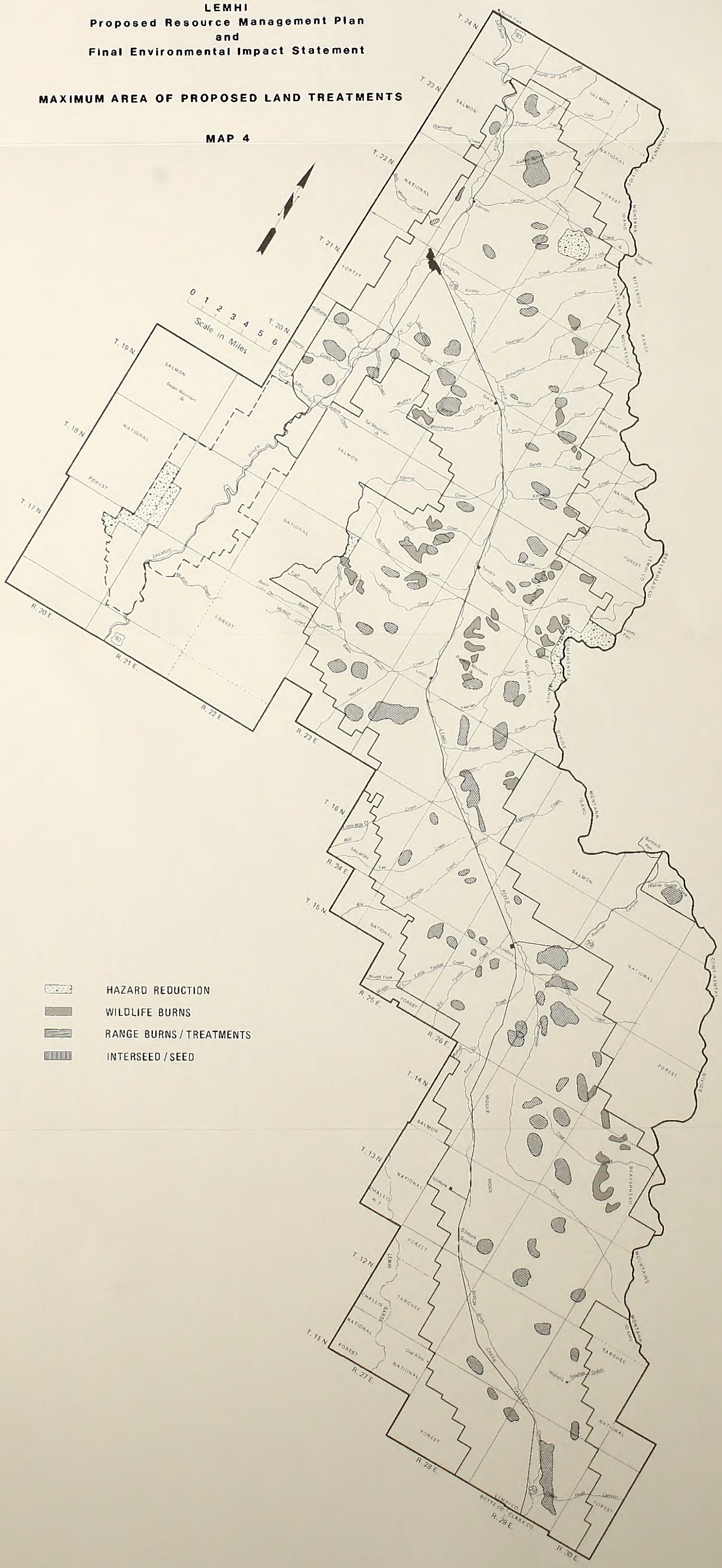
MAXIMUM AREA OF PROPOSED LAND TREATMENTS

MAP 4



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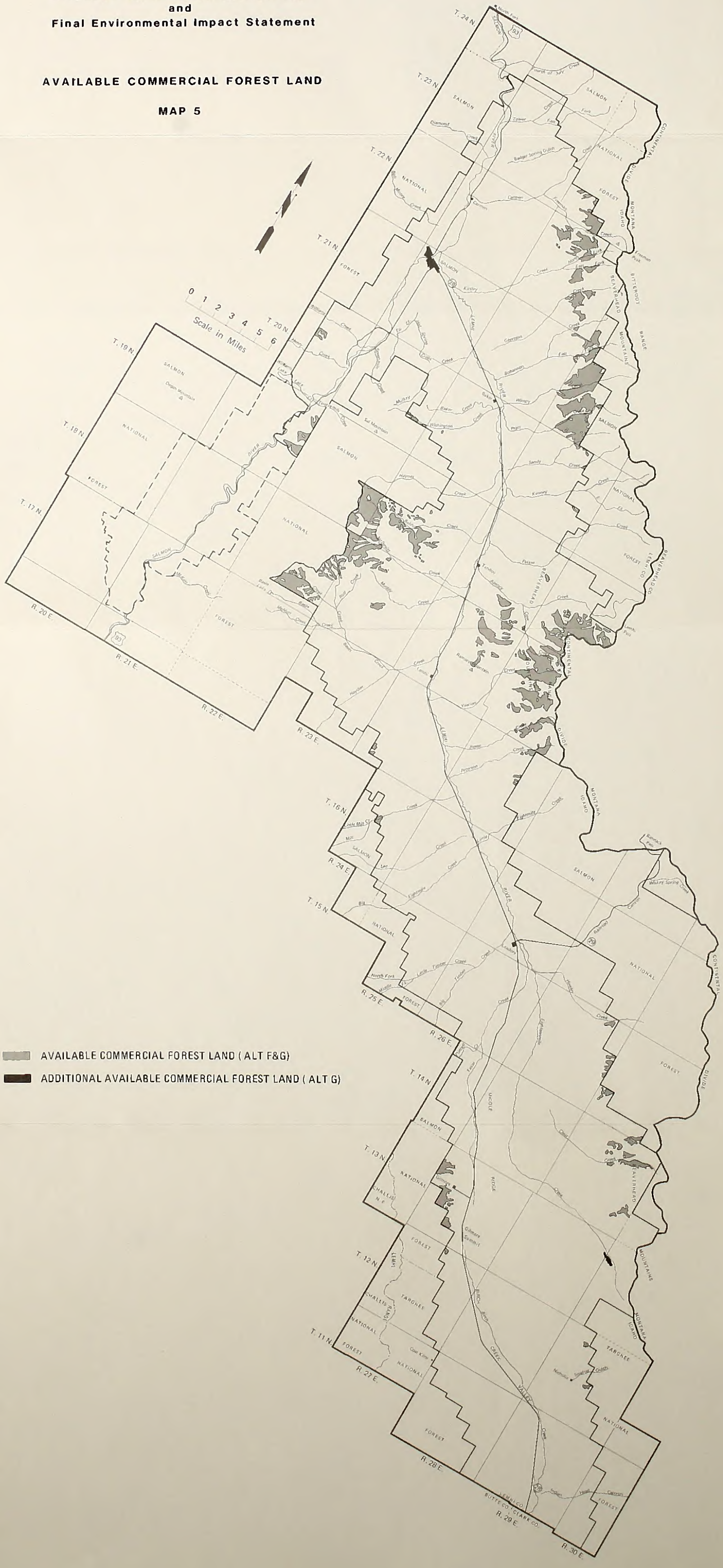
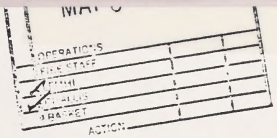
AVAILABLE COMMERCIAL FOREST LAND

MAP 5



AVAILABLE COMMERCIAL FOREST LAND (ALT F&G)

ADDITIONAL AVAILABLE COMMERCIAL FOREST LAND (ALT G)



DATE: MAY 31, 1988
SUBJECT:

FROM: ISO

TO: ID040

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
IDAHO STATE OFFICE
3380 AMERICANA TERRACE
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IN REPLY REFER TO:
7200 (932)
May 26, 1988

EMS Transmission
MEMORANDUM

To: District Manager, Salmon

From: DSD for Renewable Resources

Subject: Resource Management Water Quality/Riparian Monitoring Guidance

We still have not received any formal response to our draft monitoring guidance that was sent to EPA in November of 1986. Karl Gebhardt brought this issue up at an EPA Regional Nonpoint Water Quality Meeting in Seattle on March 15, 1988, and we are expecting action. It appears that EPAs original emphasis for such a document does not now exist. However, we should carry on with implementing the monitoring action as described in the draft document. If you would like assistance preparing the plan, please contact Karl Gebhardt.

/s/Martin J. Zimmer

cc:
Don Martin, EPA, Boise, Idaho

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